SAN FRANCISCO PUBLIC LIBRARY
3 1223 06256 0561

5/S

San Francisco Public Library

Government Information Center
San Francisco Public Library
100 Larkin Street, 5th Floor
San Francisco, CA 94102

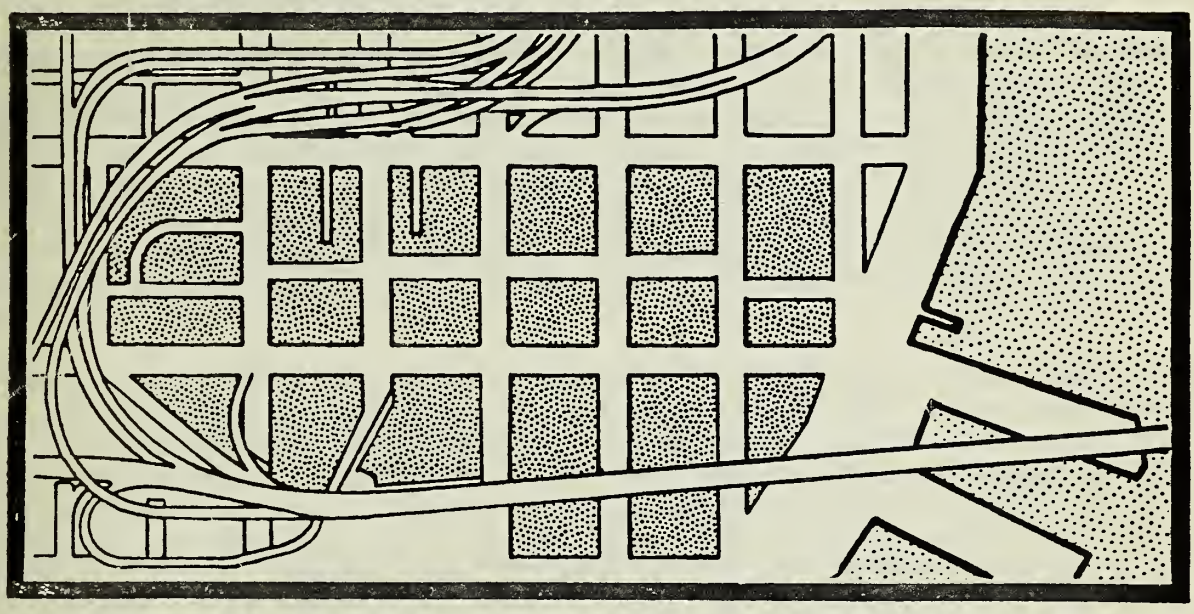
REFERENCE BOOK

Not to be taken from the Library

NOV 1 5 2002

CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF CITY PLANNING

ENVIRONMENTAL IMPACT REPORT
DRAFT SUMMARY
OF RESPONSES TO COMMENTS



THE RINCON HILL PLAN

82.39 E

PUBLICATION DATE: June 22, 1984
PUBLIC HEARING DATE: July 26, 1984
PUBLIC COMMENT PERIOD: June 22, 1984 through August 6, 1984

FINAL EIR CERTIFICATION: June 27, 1985

3 1223 06256 0561

INTRODUCTION

This document contains the public comments received on the Draft Environmental Impact Report (EIR) prepared for the proposed Rincon Hill Plan, and responses to those comments.

All substantive spoken comments made at a public hearing before the City Planning Commission on July 26, 1984 and all written comments received during the public review period from June 22, 1984 through August 6, 1984 have been reviewed and are presented herein by direct quotation, edited to delete repetitive and non-substantive material only.

Comments and responses are grouped by subject matter. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of comments under that topic. As the subject matter of the topic may overlap that of other topics, the reader must occasionally refer to more than one group of Comments and Responses to review all information on a given topic. Where this occurs, cross-references are provided. Some comments do not pertain to physical environmental issues, but responses are included to provide additional information for use by decision makers.

In response to public comment received at public hearings on the proposal and Draft EIR, revisions to the Plan are being considered that would reduce height limits of residential towers permitted at the top of Rincon Hill to 250 feet. Such reductions would correspond with a development build-out potential that falls within the scope of impacts already analyzed in the Draft EIR, which are addressed more specifically in an additional EIR alternative analysis introduced in this document (pp. 73-77). In some instances, comments in this document that address the original Plan, as described in the June 1984 Proposal for Citizen Review, carry responses that also refer to the new alternative analysis.

This comments and responses document and the Draft EIR document constitute the Final EIR for the proposed project. Changes to the EIR text, as identified in this document, will be printed subsequent to Final EIR certification and made available to replace the superceded text in the Draft EIR.

4 48545 SFPL: ECONO JRS
146 SFPL 10/25/02 2

Digitized by the Internet Archive
in 2014

https://archive.org/details/rinconhillplanen1984sanf

TABLE OF CONTENTS

	Page
List of Persons Commenting	1
Rincon Hill Plan	2
Preservation	10
Urban Design/Visual Quality	19
Open Space	32
Population, Employment and Housing	37
Transportation	41
Air Quality	55
Noise	60
Energy	64
Community Services/Public Utilities	65
Cumulative Impacts	67
Alternative	72
EIR Organization	79
EIR Corrections	82
Staff-Initiated Text Changes	83
Summary of Changes to EIR	84

List of Figures

Figure #		Page
CR-1	Existing Building Heights in Plan Area	9a
CR-2-12	Long-Range Views (Existing and Proposed) o From Twin Peaks o From Potrero Hill o From Treasure Island o From Bernal Heights o From Diamond Heights o From San Bruno Mountain	21 a-k
CR-13-26	Pedestrian Level Views (Existing and Proposed) o First and Folsom Streets o First Street/Mid-block Alleyways o First and Harrison Streets o Folsom and Fremont Streets o Folsom and Main Streets o Main and Harrison Streets	21 l-y
CR-26A	Location Guide for Shadow Impact Photographs	26a
CR-27-44	Shadow Photographs (400' and 200' Towers) o December 21 o March/September 21 o June 21	26 b-s
CR-45A	Velocity Measurement Locations at Ground Level	28a
CR-45-47	Velocity Ratios (Weighted Average) o Existing Conditions o 400 Foot Tower o 200 Foot Tower	28 b-d
CR-48	Freeway Heights	31a
CR-49	Publicly Accessible Open Space Opportunities	33a
CR-50	Street Elevations	34a
CR-51	Proposed PCS Extension	46a
40	Alternative Three Height Limits	76a
41	Alternative Three Land Use Plan	76b

List of Tables

Table #		Page
CR-1	Ratings of Buildings in Rincon Hill	13
CR-2	Summary of Rincon Hill Shadow Analysis	24-26
CR-3	Comparative Wind Speeds (400' and 200' Towers)	29
CR-4	Wind Effects	30
CR-5	Existing and Projected Curbside Carbon Monoxide Concentrations at Selected Intersections	59
CR-6	Comparative Wind Speeds (400', 200' and 250' Towers)	75

LIST OF PERSONS COMMENTING

Persons Commenting at the Public Hearing, July 26, 1984

Ruth Allen
A. Richardson Anderson
John Bardis
John Browning
Alice Carey (Rin Ten Ten)
Grant DeHart (Heritage Foundation)
Babette Drefke
Ron Mulcare

Commissioner Bierman
Commissioner Rosenblatt

Persons Commenting in Writing

Richard Anderson (Anderson Constructors, Inc.), July 6 and August 3, 1984

Burch Bachtold (Caltrans), August 6, 1984

Harvey Collins (California Department of Health Services), August 7, 1984

Babette Drefke, August 1, 1984

John Elberling (San Franciscans for Reasonable Growth), July 30, 1984

Richard Morten (San Francisco Chamber of Commerce), July 30, 1984

Frank Moss (Department of Public Works), July 6, 1984

RINCON HILL PLAN

COMMENT

John Browning

> "Why promote housing piecemeal? Why say government is going to try to perhaps get to the point of coercing development in one area when it says, "Don't develop any other area of the city."
>
> I mean, one practice is coercive; why shouldn't the other practice be coercive, too? It's the government throwing its weight around.
>
> ....[Y]ou are starting here a long process of renewal, I believe, for San Francisco. And how you do that is important and has impacts. I hope you would become aware of those completely and unanimously as we go along."

RESPONSE

The residential rezoning in 1978 reduced the potential for high density housing development in established San Francisco neighborhoods, which reduced housing growth potential accordingly. The effect of this reduced potential is particularly noticeable in the current citywide housing shortage. As a result, several Master Plan policies were adopted that promote residential development in underutilized or transitional areas. There is particular emphasis for such development in those areas that are near the downtown districts. In implementing these policies, the Department has proposed land use plans and rezoning proposals that preserve or encourage new development of housing resources in the following areas: Van Ness Avenue, Chinatown, North of Market, Rincon Hill. Under jurisdiction of the San Francisco Redevelopment Agency, housing development is a primary land use in the Rincon Point/South Beach Redevelopment Plan. Work is currently underway to derive a development plan for Mission Bay, another future housing resource area. This represents a comprehensive effort in maximizing residential development in the areas that are most accessible to public and commercial services of the downtown districts, and that would be the least disruptive to existing land use activity.

COMMENT

Commissioner Bierman

> "Page 4, it talks about differences between the Solomon Plan and the Planning Department. I didn't know there were differences, and maybe there are not, but I would like to know what Solomon's thinking was. It seems to indicate that he was thinking more about fewer, a lower density maybe than the Department is. And if that is the case, we need to know the reason."

RESPONSE

The differences between the November 1981 Rincon Hill Plan draft prepared by Dan Solomon and the University of California Housing Task Force and the

June 1984 San Francisco Department of City Planning Proposal for Citizen Review are relatively slight in principle.

The same land uses, height and bulk rules are proposed under both plans, the resulting building envelope of which (and prevailing market forces) determines residential density. Both proposals considered a range in the off-street parking requirement for residential units (one space per unit [1:1] to 1:4). Due to these two parking scenarios, both plans estimated a range of number of units possible on Rincon Hill: the low end of the range corresponded with a 1:1 parking requirement and the high end with a 1:4 parking requirement.

Differences between the two proposals lie in preservation sites, open space and affordable housing policies. The Department proposal includes an additional site encouraged for preservation, which is in the Commercial/ Industrial subarea: the Coffin-Reddington warehouse. It also incorporated the concept of the "as-of-right" and "maximum" height limits attainable through Conditional Use.

Its intent is to trade maximum height for housing subsidies to produce affordable housing at below-market rates. The Solomon Plan did not include the two-tiered height limits. However, a subsequent economic case study by Mr. Solomon and his associates analyzed the development height bonus to determine if affordable units could be provided under this system. The study indicated that such types of units could be produced, with decreasing potential realized as height limits are reduced.

Lastly, the Department proposal does not include the open space on Assessor's Block 3746, bounded by Folsom, Main, Harrison and Beale Streets, which was a part of the Solomon Plan. Because there are no available monies to acquire this property, it could not be designated for public open space in the Department's proposal.

The differences between the two proposals from the standpoint of EIR analysis centered around assumptions that were incorporated into the development potential calculations. The Department proposal assumed a building efficiency of 85%. That is, of the total amount of floor area constructed, 85% was assumed to be rentable space. The Solomon proposal assumed a lower efficiency factor of 75%, thus resulting in a lower dwelling unit potential. The Solomon Plan also assumed slightly larger dwelling unit size of 800 square feet each, versus the Department's assumption of 750 square feet. Perhaps the most influential difference, however, is that the Solomon Plan accounts for space needed to satisfy light and ventilation requirements of the City's Building Code, while the Department assumptions do not.

Readers should also refer to the discussion of alternatives on pp. 73-77 of this document. Revisions to the Plan are being considered that would eliminate the height bonus option, reducing the height limit to 250 feet at the top of Rincon Hill.

COMMENT

Babette Drefke

"The vote on the recent Proposition "M" to impose height limits on buildings, was indication enough that the voters of San Francisco want to curb high rises. If the proposition had pertained only to height limits, it would have passed with an overwhelming majority. This is the message San Franciscans are presenting. Don't raise the height limits to appease outside developers.

"I strongly support the use of Rincon Hill for residential use, but this should be housing for families. Children need to be raised in the sunny locations of the City. The children are our future, and high rises are not conducive to children living.

To return Rincon Hill to its original use does not mean 400 ft. or even 105 ft. high rises. The heights of the original houses were all below 40 ft. in height. ... I agree with the Planners that we don't want Downtown High Rise offices moving to Rincon Hill. More high rises are undesirable any place South of Market."

RESPONSE

Proposition M as an initiative on the November '83 ballot did not specifically contain height limits. It sought to provide new Master Plan policies which would require housing and transportation contributions from major office developments and which would prevent displacement of existing housing and small business. The thrust of Proposition M appears to have been in relation to office highrises, capacity of transit, and retention of affordable housing, rather than residential development per se.

The Rincon Hill Plan depends on proximity to downtown and seeks to provide housing primarily for future and existing downtown office workers. Low density, suburban type housing, or housing replicating the mansions of a hundred years ago would not address the potential of Rincon Hill to provide these employees with view apartment and condominium units within walking access to Downtown. The market for these units is unlikely to be conventional families with school-aged children. New housing more suitable for this market may be included in the mix of housing for the Mission Bay area, also a sunny location in the City. Development of a Master Plan for Mission Bay will be required, and any development proposal will be subject to a separate and extensive planning and environmental review.

COMMENT

Babette Drefke

"If there is an attempt to make this housing affordable, then it must be kept at a lower level, preferably a 40 ft. height limit where it [does not] interfere with views. The higher the buildings rise, the more expensive the construction and the deeper the foundation and base must go."

Commissioner Bierman

"I think the serious problem that we need to deal with is whether this housing is going to be the valuable housing that we want it to be. It seems to be planned that we have to do 400-foot buildings, maybe, because we have no other way of getting any kind of affordable housing. I am not so pessimistic as to think that in the next years, up to 2000, there will not be those in the country elected who believe in subsidizing low-cost housing. I may be wrong, but it has not been the habit in the past that the people who don't believe in it stay in office forever. So, whether we need to cop to the need for something that is going to change climate and weather drastically just for low-income housing is really a serious question to me....[e]specially when we don't know if we're going to get the low income housing."

RESPONSE

During development of the Plan, numerous factors were considered in the planning process to address the challenge of meeting the identified objective of maximizing housing potential in Rincon Hill, in the face of high land and construction costs, and the need for open space, views and architectural preservation. The plan in the June 1984 Proposal for Citizen Review is the product of the Department's consideration of these variables.

As required under CEQA, various alternatives to the proposed plan are analyzed on pp. 143-145 of the EIR. In addition, a new alternative is analyzed on pp. 73-77 of this document, which represents revisions that are being considered for the Plan. The alternatives provide a reasonable range of other development scenarios to evaluate the viability of each in meeting the stated objectives of the Rincon Hill Plan.

In general, it holds true that the fewer the dwelling units on a development site, the more costly they become. However, there is no guarantee that high density residential development will produce a large number of below market-rate units; in fact, it is unlikely that such a result would occur in the absence of government-sponsored subsidies. If more public subsidies (e.g. OHPP, mortgage revenue bonds) become available, there could be a sufficient increase in incentives such that developers would opt for the height bonus proposed in the Plan.

The EIR does not provide specific economic analysis of the proposed Plan, or any of the alternatives that have been identified. Economic considerations are most appropriately incorporated in the planning phase that produces a development target that best embodies the objectives of the Plan, at which point the environmental analyses would examine the potential physical impacts. The Plan may be revised, if necessary, to reflect changes in the market as they affect housing affordability, if this is determined to be a primary public policy objective.

COMMENT

Burch Bachtold, Caltrans

"The State of California owns the larger portion of Assessor's Block 3745. Our comments follow:

Assessor's Block 3745
Proposed "As-of-Right Height Limits": The proposed height limits for this block appear inconsistent with one of the objectives of the plan, i.e., "...heights stepping down as elevation decreases." The northerly portion of the State property which faces Folsom Street falls within a proposed 165 foot height limit, yet property to the east has a 200 foot height limit. The remaining portion of the State property falls within an 84 foot height limit, yet the major portion of the property to the east has a 105 foot height limit and the property to the west is in a 120 foot height limit. We request that proposed As-of-Right Height Limits for Assessor's Block 3745 be increased to be consistent with the plan. We would recommend 200 feet for the northerly portion and 110 feet on the southerly portion.

Assessor's Block 3745
Maximum Height Limits: The southerly portion of this block is proposed for a height limit of 105 feet. The property to the west is 150 feet. In keeping with the stepped down approach we feel this area should have a maximum height limit of 130 feet."

RESPONSE

The Rincon Hill Plan contains a policy stating "Structures approaching the Embarcadero should step down in height so as to acknowledge the meeting of land and water". This policy states a general principle for the overall pattern of the area, not an absolute rule.

The 200 foot "as-of-right" height limit proposed for Block 3744 (the Hill's Brothers block) in the June 1984 Proposal for Citizen Review, is the one area that would deviate from this stepped pattern. The site, which contains the 175 foot landmark tower, was zoned for 200 feet primarily for the purposes of obtaining housing units on the site. For details of this proposal, please refer to the project-specific Draft EIR, file number 84.41E, published December 7, 1984. Certain portions of the office and commercial floor area are proposed above 84 feet, which is the height limit for the rest of the Commercial/Industrial Subarea. The project as proposed requires a height rezoning on this portion of the site, in order for the project to be approved.

The stepped pattern of development proposed by the Plan was designed to graduate building heights not only in a northeast direction (i.e. alignment with Folsom and Harrison Streets), but also down to the east towards the Bay Bridge (which runs diagonal to the orientation of the streets and Assessor's Blocks). Under the proposed maximum height limit of 200 feet for the northern portion of the Caltrans block (on the Folsom Street frontage), new residential

development at this height would be consistent with the urban design objectives of the Plan (with respect to height), as viewed from the Bay Bridge.

Revisions to the height limits in the Plan area are currently being examined in an additional alternative. Pages _____ of this document provides an evaluation of the height limit policies currently contemplated.

COMMENT

Burch Bachtold, Caltrans

> "The State owns the four-story office building located on the southwesterly quadrant of the block which is referred to on page 28 of the [Environmental Impact] report. Consistent with our understanding of the last paragraph on page 77 of the report, this office use can continue as a non-conforming use with no termination dates. We assume that proposed prohibition of expansion of existing facilities does not preclude modernization of existing facilities."

RESPONSE

The referenced language on p.77 of the EIR states the circumstances and extent to which a local zoning ordinance regulates State- or Federally-owned property. Essentially, as properties currently zoned for P (Public) use, local rezoning may not be imposed if the affected properties continue under public ownership and are not leased to the private sector for private activities. If the State or Federal governments use these properties and facilities for their administration or other public sector operations, they would not be non-conforming uses. If, however, State or Federal agencies decide to use the property or facilities for non-public use, then the regulatory measures of the local rezoning would be applicable.

The non-conforming use issue raised in the comment was addressed in a letter to Caltrans, dated September 28, 1984 from the Zoning Administrator of this Department, which states the activities permitted on the site under the presently applicable RC-3 (Residential Commercial Mixed, Medium Density) controls. As a building used formerly for warehouse use, any office activity within would be an accessory use only. The basic intent of the prescribed guidelines have as their purpose the maintenance of blue collar jobs in the area or the provision of services for persons working or living in the area.

Under permanent controls such as those proposed under the Rincon Hill Plan, the subject building used for private activities, would be a non-conforming use subject to the provisions of Planning Code Section 182, which governs changes of use (i.e. conversions of warehouse to office use). With respect to alterations of non-conforming uses, Section 181 of the Planning Code states the conditions under which they are permitted.

COMMENT

Richard Anderson

"The major inconsistency between the DEIR and the Rincon Hill Plan pertains to the latter's policies regarding the existing housing on Guy Place. Specifically, the DEIR states:

> The Plan guidelines encourage [the retention of existing lowrise housing on Guy Place] by requiring developers who demolish these buildings to replace them at comparable rents in new structures conforming to the requirements of alley housing.[1]

The Plan, however, makes no mention of these requirements. It instead implicitly prohibits any redevelopment or replacement of the existing housing by asserting that "these buildings should be retained essentially intact" as they purportedly provide examples of the residential character which the Plan seeks to extend. This inconsistency should be eliminated from the EIR."

Rin Ten Ten

"The E.I.R. notes that demolition and replacement of units on Guy Place is acceptable if it is consistent with the new plan, i.e., low density, affordable housing can be replaced by high density upper income housing. Lack of density restrictions, the proposed height limit of 84 feet and minimal parking requirements actually encourages developer incentive to demolish this designated "preservation area." Because demolition of affordable housing is inconsistent with City policy, the impact of same should be addressed."

Commissioner Bierman

"Page 21, if the area upgrades, won't Guy Place rents go up. Are we really protecting Guy Place when we are saying you have to do something of equivalent rents in a high-rise if you tear down a place, because by the time they do that, the rents may be high and we won't be dealing with these 250 and 350 rents. I don't think that the Guy Place is very well protected."

RESPONSE

The Plan does not include a requirement for developers to replace Guy Place housing at comparable rents. The text referred to by one commenter starts on the third line of the third complete paragraph on p.18 of the EIR. The text has been corrected to read:

"The Plan guidelines encourage the preservation of this scale of housing within the residential subarea by establishing specific requirements for alley housing. These requirements would dictate setback, access and building frontage standards."

Revisions to the Plan are currently under consideration that would establish clear policy encouraging the preservation of existing housing units on Guy Place and Lansing Street. This would be consistent with existing Master plan policy that discourages the demolition of existing housing resources (Residence Element; Objective 3, Policy 1), which generally represents the City's lower-cost rental units. New housing, however, would be required to conform to a lower height limit (from 105 to 84 feet), as well as setback and building bulk standards that would apply to development along the proposed pedestrian alleys and at the crest of Rincon Hill. These additional building envelope restrictions limit the viability of redeveloping any Guy Place or Lansing Street site that already contains housing. If there is sufficient demand for housing development in the future, it would be most likely to occur on larger, vacant sites elsewhere in the residential subareas which offer higher height limits, greater design flexibility and thus higher density development.

The primary intent of the Rincon Hill Plan policies, as they relate to housing preservation on Guy Place and Lansing Streets, is to retain the particular scale of development that is characterized by the existing housing units, which sets an example of the type of housing proposed in the Plan for the pedestrian alleyway system. However, the Plan does not provide any expressed policy that they be retained as low-priced rental units. It is probable that prices for this housing will escalate over time.

COMMENT

Commissioner Bierman

> "Page 3. It keeps talking about subareas, and I couldn't find a map. I expect I just missed it, but I couldn't find anything that really shows what the subareas are and wondered if there is one.
> ... It would be helpful to know a little better about the heights that are there now. It's hard to know on a block, if it's going to go 400 feet, where does it begin? How many feet? It would be nice to have a chart that showed what the elevations are. It does talk to it later on Page 66, but I think it ought to be a little clearer in where we could compare it to what we are planning."

RESPONSE

The three subareas proposed in the Rincon Hill Plan (for High-rise Residential, Mid-rise Residential, and Commercial/Industrial uses) are identified on Figure 2, p.9 of the EIR.

Figure CR-1 shows height measurements of existing buildings in the Rincon Hill Plan area, measured from grade level. These differ from heights indicated on Figure 29, p.66 of the EIR, which are street elevations measured after grading, San Francisco Datum, and account for topography of the site. San Francisco Datum is approximately 8.6 feet above mean sea level.

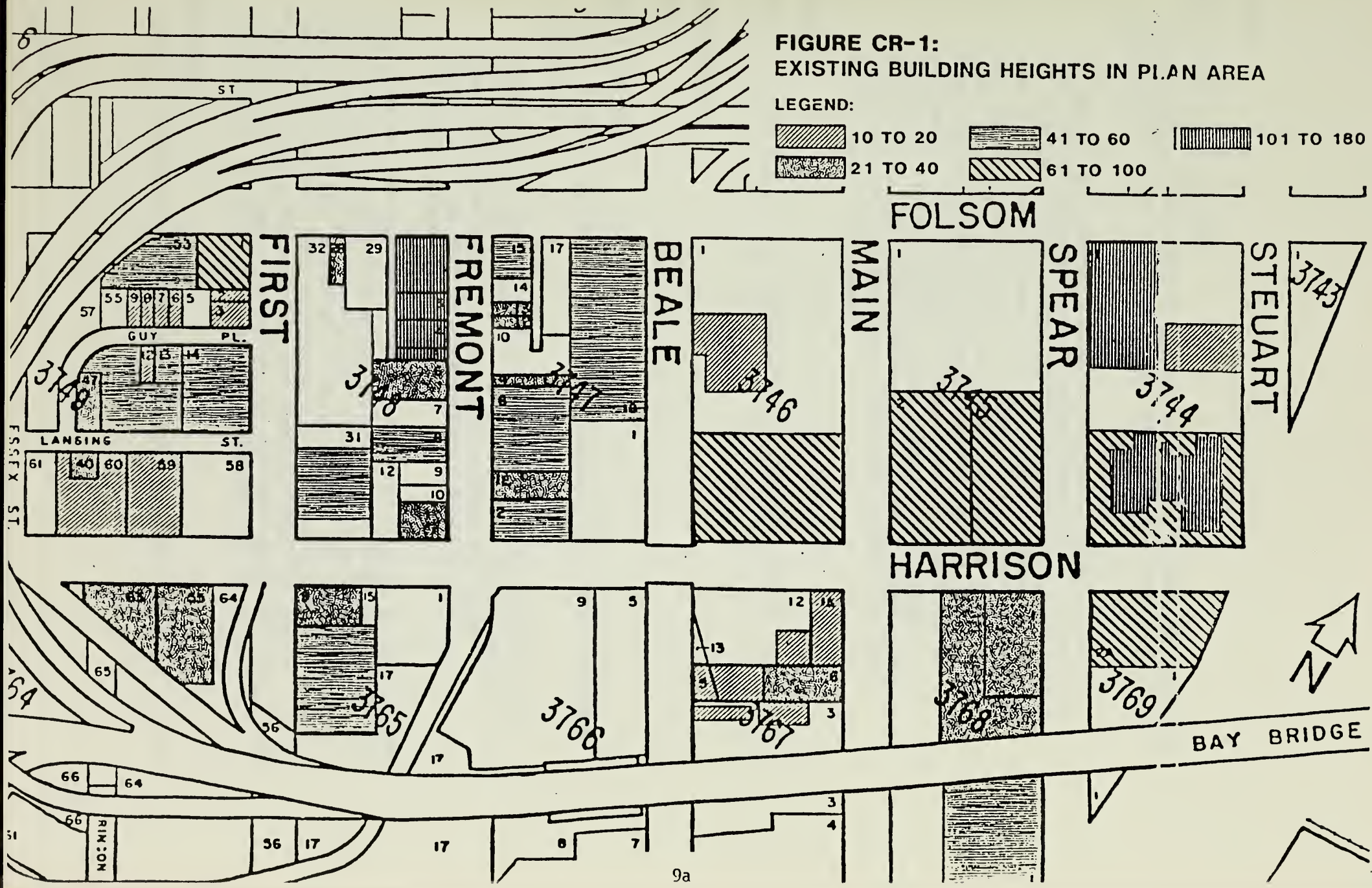


FIGURE CR-1:
EXISTING BUILDING HEIGHTS IN PLAN AREA
LEGEND:
10 TO 20
21 TO 40
41 TO 60
61 TO 100
101 TO 180
FOLSOM
HARRISON
FIRST
FREMONT
BEALE
MAIN
SPEAR
STEUART
GUY
PL.
LANSING
ST.
ESSEX ST.
RINCON
BAY BRIDGE
3743
3744
3746
3747
3748
3765
3766
3767
3768
3769

COMMENT

Peter Straus, Muni Planning

"On Page 28 [of the Rincon Hill plan] you propose certain Muni services. We would request that you delete that paragraph and instead note the following:

> As daytime and evening population increases, transit services will need to be established to serve Rincon Hill. The Municipal Railway has briefly studied the needs and tentatively recommends that one of several lines could be extended to provide local service to the new Rincon Hill community. Residential areas need all day local service, and with this neighborhood's proximity to downtown, limited or express service is not necessary. Several lines, including the 1-CALIFORNIA or 41-UNION or some other Muni line, could all be extended to Rincon Hill. Any of the routes would use Beale Street in both directions, using a northbound transit only contraflow lane, between Howard and Bryant."

RESPONSE

Comment is noted and will be incorporated as a revision to the Plan proposal.

PRESERVATION

COMMENT

Richard Anderson

"With regard to the historical/cultural impacts of the Plan, the DEIR declares:

> Several building sites within the project area are listed in the San Francisco listing of Architecturally and/or Historically Important Buildings. Eight of these building sites are specified in the Plan for preservation. These include the residential units on Guy Place...[4]

This statement is incorrect. The architectural listings on file at the Department of City Planning do not include the residential structures on Guy Place; these structures display no significant architectural characteristics that are worthy of preservation. In essence, the DEIR incorrectly assumes that redevelopment of the existing housing on Guy Place will have an important adverse impact on San Francisco's architectural heritage. All references to preservation of housing based on historical or design merit should be deleted from the EIR."

Rin Ten Ten

"Preservation of existing residential units is called for on Guy Place

only. Residential units on Lansing Street should be considered as part of the total residential preservation plan."

Grant Dehart, Heritage

"We'd urge that the staff consider and the Commission consider inclusion of 501 Folsom Street in your list of buildings to be preserved, and also to consider the impact of the plan on the immediately adjacent 240 Steuart Street, which is the Seaman's Institute and the current Sale Loft. Both of these, we feel, are eligible for the National Register, and we can provide detailed information about them to the staff."

Commissioner Bierman

"Page 22, it's encouraging to see preservation emphasis. Are there other buildings that should be considered for preservation? I know Mr. Dehart listed a couple. I think any that have been rejected should be in so that we can judge whether they should or shouldn't be included."

Rin Ten Ten

"In addition, other architecturally significant buildings at 375 and 355 Fremont, and 401 Folsom can be demolished under the current plan. Is the removal of historically significant structures beneficial or detrimental to the development of Rincon Hill?"

John Elberling, SFRG

"What is actually proposed by the project is not clear. The Implementing Ordinance in the Rincon Hill Plan publication makes no mention of preservation requirements. The text of the Plan identifies objectives, to be only possibly enforced through the conditional use review process. The DEIR uses the term "encourage" preservation of a list of properties in the Project Description, but the Impact Section says those properties are "specified" for preservation.

The bottom line is that NO properties' preservation is being required for architectural/historic preservation. This brutal fact should be stated honestly and forthrightly, not obfuscated as at present.
Whether or not the properties will subsequently be demolished or substantially alternated is left to the C.U. discretion of the Planning Commission on a project-by-project basis. That must be disclosed.
Given that, it is definitely possible that under the Rincon Hill Plan some or all of the identified meritorious structures may indeed be lost. Thus the Impacts section must discuss the consequences of such a worst case, and this will overlap with the Urban Design discussion as well.
This immediately suggests that a sub-alternative, the "Historic Preservation Alternative," must be included in the EIR. The same mechanism as included in the Downtown Plan to identify and rate historic/architecturally significant properties, and the requirements for their preservation, can be utilized with the significant properties in the Rincon Hill Plan. TDR's may or may not be incorporated into the system.
The discussion of historic perservation in the Plan and DEIR is very, and

I suspect knowingly misleading - implying much more preservation than may well actually result."

RESPONSE

Subsequent to publication of the Draft EIR, the Department of City Planning surveyed buildings in the Rincon Hill area (including those cited by commenters) for architectural excellence. The survey methodology and 13 evaluation criteria are the same as those employed in rating buildings for Individual or Contextual Importance in the Downtown Plan. However, buildings in the Rincon Hill area are not arrayed in the four-category system contained in the Downtown Plan; the survey makes a distinction between "Significant" and "Contextual" structures. The Rincon Hill Plan contains no provisions for transfer of development rights (TDR). Table CR-1 identifies the buildings surveyed and their respective ratings, as applicable.

As a result of the survey, the building at 501 Folsom Street, Gimbel Brothers Candy Factory, was identified as a Significant building. Revisions are being considered that would amend the Plan to include 501 Folsom Street as a recommended preservation site.

Many buildings in Rincon Hill were rated in the 1976 Architectural Survey prepared by the Department of City Planning, which focussed on the top 10% of San Francisco buildings. This information provided one basis for identifying the buildings encouraged for preservation in the June 1984 Rincon Hill Plan - Proposal for Citizen Review. At that time, housing on Guy Place was considered important for preservation and was therefore also included.

Since then, revisions to the Plan have been under consideration that would more clearly delineate between architectural preservation, and preservation of existing housing resources. A new housing objective would specifically target the housing units on Guy Place and Lansing Street for preservation. These units set an example of the residential character and scale sought for new housing along the proposed pedestrian alleyways.

Table CR-1 RATINGS OF BUILDINGS IN RINCON HILL

Address	Block/Lot	Heritage Rating	1976 DCP Arch.Survey	1985 DCP Arch/Hist.Survey
425 First (Union Oil Building)	3765/9*	Not Rated**	4	Significant
301 Folsom (Coffin-Reddington Building)	3747/1B*	B	Not Rated	Significant
401 Folsom	3748/1	Not Rated	0	Not Rated
443-7 Folsom (Klockars Blacksmith Shop)	3748/28*	B	1	Significant
501 Folsom (Gimbel Brothers Candy Factory)	3749/1	B	2	Significant
515 Folsom	3749/53	C	Not Rated	Contextual
355 Fremont	3747/6	C	1	Contextual
2-30 Harrison (Hills Brothers Coffee)	3744/1*	A	3	Significant
29-35 Harrison (Joseph Magnin Warehouse)	3769/2A*	A	Not Rated	Significant
450 Harrison (Sailors Union of the Pacific)	3748/31*	Not Rated**	4	Significant
66-8 Lansing	3749/47	C	2	Contextual
400 Spear (Hathaway Warehouses)	3768/1*	A	Not Rated	Significant
Guy Place Housing	3749*	Not Rated	Not Rated	Not Rated

Table CR-1 (cont)

*	These buildings are encouraged for preservation in the Rincon Hill Plan - Proposal for Citizen Review, JUne 1984.
**	Hertiage ratings apply to structures built before 1945. The Union Oil Building and Sailors Union of the Pacific were altered and constructed, respectively, after 1945, and are therefore not rated. However, due to the unusual architectural merit of these two buildings, Heritage does note that, had they been formally included in the survey, both would have received "A" ratings.

The implementing ordinance proposed for the Plan does not mandate preservation of structures on the seven "significant" buildings identified. As specific development projects are submitted for any of these sites containing significant structures, some or all of them could be proposed for demolition. An amendment is currently under consideration that would require Conditional Use review of development proposals of 40 feet in height or greater, per Section 303 of the Planning Code which, among other potential factors such as design, shadows, wind, parking, and housing production, would consider preservation of the affected structure(s). The Plan ordinance requires conformity with the Rincon Hill Plan, as part of the Master Plan, as one of the criteria for approving Conditional Use permits. If, after weighing the various issues, a development proposal (new construction, alteration, or demolition) is determined to provide a net benefit to the City, it may be approved with or without conditions or disapproved. Given the height limits proposed (ranging from 84 to 400 feet), the conditional use requirement would apply to virtually all seven significant buildings. If adopted, this measure would provide adequate mitigatory protection. Klockar's Blacksmith Shop, as a designated City Landmark, is the only structure protected by provisions of Article 10 of the Planning Code, which also requires Planning Commission review in order to obtain a Certificate of Appropriateness for any alterations, removal or demolition proposed.

The addition of an Historic Preservation Alternative, as suggested by one commenter, would not change the development potential analyzed in the EIR. The development potential includes that which could occur on the sites containing Significant and Contextual buildings through adaptive reuse, or demolition and new construction. However, given the existing scale of development in six of the eight buildings currently recommended for preservation in the Plan (Coffin-Reddington, Hills Brothers, Joseph Magnin Warehouse, Hathaway Warehouses, Union Oil and Sailors Union of the Pacific), the reduced height limits proposed for most of the sites, and the conditional use requirement described above, it is not likely that they would be demolished in the foreseeable future. The height and bulk limits proposed in the Plan would provide limited development potential/economic return beyond what can currently be obtained from these sites.

The 501 Folsom Street building, the Significant structure that is not currently included in the preservation policies of the Plan, also would not be likely to be demolished. The site is already developed close to the allowable FAR limits; these limits continue to be the same (5:1) under the proposed Plan.

Development potential under the proposed Plan would be greatest on the Klockars Blacksmith site which, if combined with the adjacent parking lot, could be developed up to a maximum height of 200 feet. This would generate a notable change that would increase shadows on Folsom Street, and could likely generate accelerated wind speeds at the sidewalk level. This site is located on the western side of the Plan area, and thus would be subject to greater wind exposure. However, the site is also surrounded by the elevated freeway, which could provide a partial windbreak. While the proposed Plan supports the retention of Klockars Blacksmith on its current site, it also acknowledges that relocation of this structure could be necessary in order to provide for housing development.

The site at 355 Fremont could likely be redeveloped for high-rise residential use which would demolish this contextual building. Under the proposed Plan, it could be developed up to 360 feet in height, and would be more likely than the Klockars Blacksmith site to accelerate wind speeds at street level; development on the site would be higher and less protected by the elevated freeway from prevailing westerly winds. Views of the Bay and the bridge from points at the top of Rincon Hill, southwest of the site, would be obstructed. Shadows in December (the period of longest shadows) would likely extend across Folsom Street in the morning (about 10:00 a.m.) and would extend far to the northeast over the course of the day. While these shadows could impact open space areas in future developments that may be occupied before the 355 Fremont site, they would not likely impact the Embarcadero park proposed in the Rincon Point/South Beach Redevelopment Plan.

The objectives of the proposed Plan do not encourage demolition of architectural/historic resources. Instead, the Plan formally calls for the preservation of certain buildings for which there currently is no such public policy. If future development proposals included the demolition of any of the significant buildings, this could constitute a significant environmental impact which would be analyzed in detail along with the development project. The proposed Plan policies, however, offer sufficient mitigation to avoid such significant impacts, if the conditional use requirement described above was adopted.

Based on the above discussion regarding the new survey of Rincon Hill structures. the Draft EIR has been revised to incorporate this information, and to correct or clarify other statements.

The following paragraph has been added to the bottom of p. 46 of the Draft EIR:

> "Buildings in the Rincon Hill area were surveyed for architectural/ historic excellence, utilizing evaluation criteria developed by the Department of City Planning for rating buildings in the Downtown district. (A detailed explanation of each of the 13 criteria is available for public review at the Department offices, 450 McAllister Street, San Francisco, CA 94102). The new survey criteria differ from those that were included in the Department's 1976 survey, which focused primarily on architectural considerations. The new survey included criteria regarding historic considerations and information from the Heritage Foundation. Thus Department ratings from the 1976 and 1985 surveys do not necessarily correlate. Table 1A contains the ratings for buildings in Rincon Hill."

Table 1A BUILDINGS PROPOSED FOR PRESERVATION IN THE RINCON HILL PLAN

Address	Block/Lot	Heritage Rating	1976 DCP Arch.Survey	1985 DCP Arch/Hist.Survey
425 First (Union Oil Building)	3765/9	Not Rated*	4	Not Rated
301 Folsom (Coffin-Reddington Building)	3747/1B	B	Not Rated	Significant
443-7 Folsom (Klockars Blacksmith Shop)	3748/28	B	1	Significant
Guy Place Housing		Not Rated	Not Rated	Not Rated
2-30 Harrison (Hills Brothers Coffee)	3744/1	A	3	Significant
29-35 Harrison (Joseph Magnin Warehouse)	3769/2A	A	Not Rated	Significant
450 Harrison (Sailors Union of the Pacific)	37489/31	Not Rated*	4	Not Rated
400 Spear (Hathaway Warehouses)	3768/1	A	Not Rated	Significant

* Heritage ratings apply to structures built before 1945. The Union Oil Building and Sailors Union of the Pacific were altered and constructed, respectively, after 1945, and are therefore not rated. Due to the unusual architectural merit of the Salors Union of the Pacific, however, Heritage felt compelled to indicate that this building would have received an "A" rating, had it been included.

The first paragraph on p. 90 of the Draft EIR has been revised to read:

"Eight buildings are encouraged for preservation in the Plan, which are listed in Table 1A, contained in the setting discussion beginning on p. 45. Figures 33-39 depict all the buildings encouraged for preservation, with the exception of the dwelling units on Guy Place. The Plan encourages the preservation of these units to maintain this scale of development, which is the desired scale for developments of new housing along the proposed pedestrian alleyways. Specific bulk provisions in the Plan for alley housing are modeled on the scale of the Guy Place units."

The second paragraph on p. 90 of the Draft EIR has been revised to read:

"The Klockars Blacksmith is recognized in the Plan as a building which is "architecturally undistinguished but has received landmark designation because it is one of the last "smiths" in the South of Market district from the early 20th century. While the Plan recommends that the structure be retained on its current site, it also acknowledges the possible need to relocate the structure to allow for the development of housing."

The third paragraph on p. 90 of the Draft EIR has been revised to read:

"The Plan does not recommend that any other architecturally rated buildings in the area for preservation. Mixed residential/commercial buildings could replace the building at 355 Fremont, which received a rating of "1" in the 1976 Department survey. Redevelopment of the Klockars Blacksmith site would also be likely."

The following text has been added to bottom of p. 90 of the Draft EIR:

"If combined with the adjacent parking lot, the Klockars Blacksmith site could be developed up to a maximum height of 200 feet. This would generate a notable change that would increase shadows on Folsom Street, and could likely generate accelerated wind speeds at the sidewalk level. This site is located on the western side of the Plan area, and thus would be subject to greater wind exposure. However, the site is also surrounded by the elevated freeway, which could provide a partial windbreak. While the proposed Plan supports the retention of Klockars Blacksmith on its current site, it also acknowledges that relocation of this structure could be necessary in order to provide for housing development.

The site at 355 Fremont could likely be redeveloped for high-rise residential use which would demolish this contextual building. Under the proposed Plan, it could be developed up to 360 feet in height, which would be more likely than the Klockars Blacksmith site to accelerate wind speeds at street level; development on the site would be higher and less protected by the elevated freeway from prevailing westerly winds. Views of the Bay and the bridge from points at the top of Rincon Hill, southwest of the site, would be obstructed. Shadows in December (which are the longest shadows) would likely extend across Folsom Street in the morning (about 10:00 a.m.) and would extend far to the northeast over the course of the day. While these shadows could impact open space areas in future developments that may be occupied before the 355 Fremont site, they would

not likely impact the Embarcadero park proposed in the Rincon Point/South Beach Redevelopment Plan.

Given the existing scale of the seven buildings, other than Klockars Blacksmith, which are encouraged for preservation, it is not presumed that they would be demolished. The height, bulk and permitted uses proposed in the Plan for these sites would provide limited or a deficit of development potential compared to what currently exists."

COMMENT

Grant Dehart, Heritage

"We'd also suggest strongly that explicit policies suggesting the moving of landmarks or significant buildings would be inappropriate, and this would have a negative impact on not only the buildings but their eligibility for the National Register and the tax benefits for rehabilitation."

Rin Ten Ten

"The E.I.R. notes that Klockar's Blacksmith, a local landmark, can potentially be moved. A landmark, by definition, literally marks the land, i.e., identifies and distinguishes the area surrounding it from other areas. If the physical structure is removed from the land it marks, does this affect its historic significance? The impact of the removal of a landmark from its site should be further studied."

RESPONSE

The text for Site 5 - Klockar's Blacksmith Shop on p.21 of the EIR has been corrected to read: "The wood-frame city landmark building should be retained." It is not the intent of the proposed Plan to seek relocation of this landmark structure. As noted in the previous response, under provisions of Article 10 of the Planning Code which deals with Landmarks Preservation, relocation of structures is possible upon securing a Certificate of Appropriateness. Such an issuance requires public hearing and approval by the City Planning Commission.

COMMENT

Peter Straus, Muni Planner

"The Department of City Planning proposes to designate the Union 76 building as a landmark. The Muni Railway Planning Division believes that such a designation should not be granted to this building. The building is neither historic, beautiful nor handsome. It is, and has always been, a cheap looking, ugly convenience to motorists, not a memorable example of urban architecture. The structure's only redeeming feature is perhaps its digital public clock; but this hardly seems to justify landmark status for the building as a whole, particularly since the proposed high density residential structures (pages 15, 47) will mask visibility of the clock from the northwest (e.g., from near the Transbay Terminal). Monuments to

the automobile, like this one erected by a company that thrives on this American mania, should not be encouraged, approved or protected. They should be scrapped. We hope this one eventually is."

RESPONSE

There is no proposal in the Rincon Hill Plan to designate the Union 76 Building a landmark. While its preservation is urged in the plan, landmark status per se is another matter to be considered, if requested, under the procedure and criteria of Article 10 of the City Planning Code.

The Department does feel that in its context the structure has been important to its location, if not the immediate neighborhood, for the past 30 years and will continue to be so.

While it may or may not be a memorable example of urban architecture, its supergraphics and horological disclosures surely elevate it to the distinction of being the most remembered structure on the San Francisco bridge approach.

Far from being a jarring note in the environment, it instantaneously signals one's imminent arrival into or departure from the city. In contrast to most other commercial billboards along freeways in San Francisco, the tower's fixed, unchanging commercial message and character (like that of the Hills Brother Coffee Bedouin, particularly when seen from the freeway along the Washington-Broadway exit) positively establishes a benchmark of reassurance in one's journey.

Regarding the building being a monument to the automobile, we question such an interpretation: a by-product perhaps but hardly a monument.

Finally, if as the critic has proposed that (bona fide) monuments to the automobile be scrapped, it's also farewell to most of the best buildings along Van Ness and -- New York's Chrysler Building.

URBAN DESIGN/VISUAL QUALITY

COMMENT

Babette Drefke

"The view of the Bay and Bridge belongs to every one. It is the responsibility of the Planning Department to see that it is preserved for all not just a chosen few.

...Admittedly Rincon Hill could be one of the quote "grandest sites," but improving that area should not be at the expense of adjacent neighborhoods. Ten or twelve high rises will make a wall that will screen the view of the Bay Bridge and the Bay with its related activities from the rest of the San Francisco residents; many of whom have been faithful to San Francisco for generations."

Commissioner Bierman

"I think that on the early pages in the summary, where we are doing view pictures, we need to have a photograph of the model as it would look from Twin Peaks and what it would do to Twin Peaks, Buena Vista, Ashbury Heights, Potrero Hill in terms of the view of the Bay Bridge as well as the bay.

We have had some high-rises in the past in this area that have significantly closed off that view from those major residential areas. On Page 14, Figure 7, it's supposed to be a view from the bay, which I presume means from boats, but the picture is taken from the air. I don't know what view those high-rises are blocking, whether it's of the San Bruno mountain or the peaks or what it is. So I think we need some more accurate photo from lower down. We need a photo looking from this project to the west toward Twin Peaks to see whether this blocks any significant view of that. We also need a photo with -- there is a photo on Page 1, and there should be a photo, that same photo with the model in it, which might give us a little better idea, a more realistic idea of the size of the project.

I guess the major problem with the photos that are there is that they're all from high up and from quite a distance, so there is really no way to get an idea of, from ground level, residents walking along the street, what this is going to look like. It's more a distance thing of little toy buildings, and you don't get an idea of what the impact of it all will be. I think the air photos from a distance minimize the size of the project."

RESPONSE

For the sole purpose of responding to the comments above, view studies were prepared for the Rincon Hill Plan, based on a conceptual model of full build-out prepared by Daniel Solomon and Associates. No such studies were provided in the Draft EIR, because there is no clear basis on which to project how future development may be designed. The studies presented here can only provide one designer's concept of the Rincon Hill Plan, although it may depict a general level of impact created by future development. As explained several times in the EIR, it is not clear as to how development may occur under zoning proposed by the Plan. Based on past patterns, it is highly unlikely that development for the entire plan area would fill the envelope permitted by the zoning. Because implementation of most of the plan policies is dependent upon private, individual development proposals, building density, site assembly, design and array of land uses would be determined by factors that may combine in an infinite number of ways. This development would occur in unrelated increments over time. Figures CR-2 through 12 provide long-range views from different locations in the City under existing and possible future conditions. Figures CR-13 through 26 provide sidewalk perspectives at different points within the Rincon Hill Plan area under existing and future conditions.

The long-range view studies was prepared by the Environmental Simulation Laboratory (ESL) at U.C. Berkeley. Actual long-rang views as seen by pedestrians from Twin Peaks, Diamond Heights, Bernal Heights, Potrero Hill, Treasure Island and San Bruno Mountain were taken. Simulating these view angles and distances, the Solomon model, in context of the model of San Francisco at the ESL, was photographed. Thus, photos of the models do not show geographic land forms in the background. Only from Figures CR-6 and 7, which are views from Treasure Island, can one approximate possible blockage of long-range views under the Solomon model. As noted on the photo of existing conditions, Diamond Heights and Mt. Davidson are visible geographic forms, with Twin Peaks tucked behind the Downtown core. Under the Solomon model, views of Diamond Heights would be obstructed.

Figures CR-13 through 26 contain views at sidewalk level within the Plan area. As seen from the photographs of existing conditions, few views of areas outside the Rincon Hill area are available from the pedestrian level although there are several of the Bay Bridge and Bay. The overlays that represent block diagrams of building envelopes of the Solomon model are devoid of facade or architectural detailing. This lack of pedestrian amenities and articulation tends to overstate impacts.

COMMENT

Babette Drefke

"It is said the weather is choice on Rincon Hill, almost as good as on Potrero Hill. But it will be spoiled by the shadows caused from the highrises. They will also cause cold windy canyons. The financial district is a good example. It's the coldest, windiest place in town. Placing the High Rises on top of the hill will only make the shadow greater and raise the building higher to block more views. The fine weather will soon be changed to cold and windy."

Commissioner Bierman

"Now, page 3 and page 4, I just want to read a few lines. It says, "Changes in local wind patterns would occur in the project area vicinity as a result of build-out. Without actual building layouts and designs, estimated effects can only be speculative. Open space areas such as the east-west walkway system," which is one of the big open space plans, "would be shadowed by the surrounding buildings. The extent to which these impacts would occur would be more fully evaluated upon review by specific proposals for development.

I will tell you what worries me about this, and it worries me throughout the whole document: Once we establish a height limit of 300 or 400 feet, it's very difficult, when a developer comes in with a specific plan that he has spent money on, to say to him, "Well, my goodness, this is going to shadow the overpass that we are calling open space. You better lower your building by 200 feet."

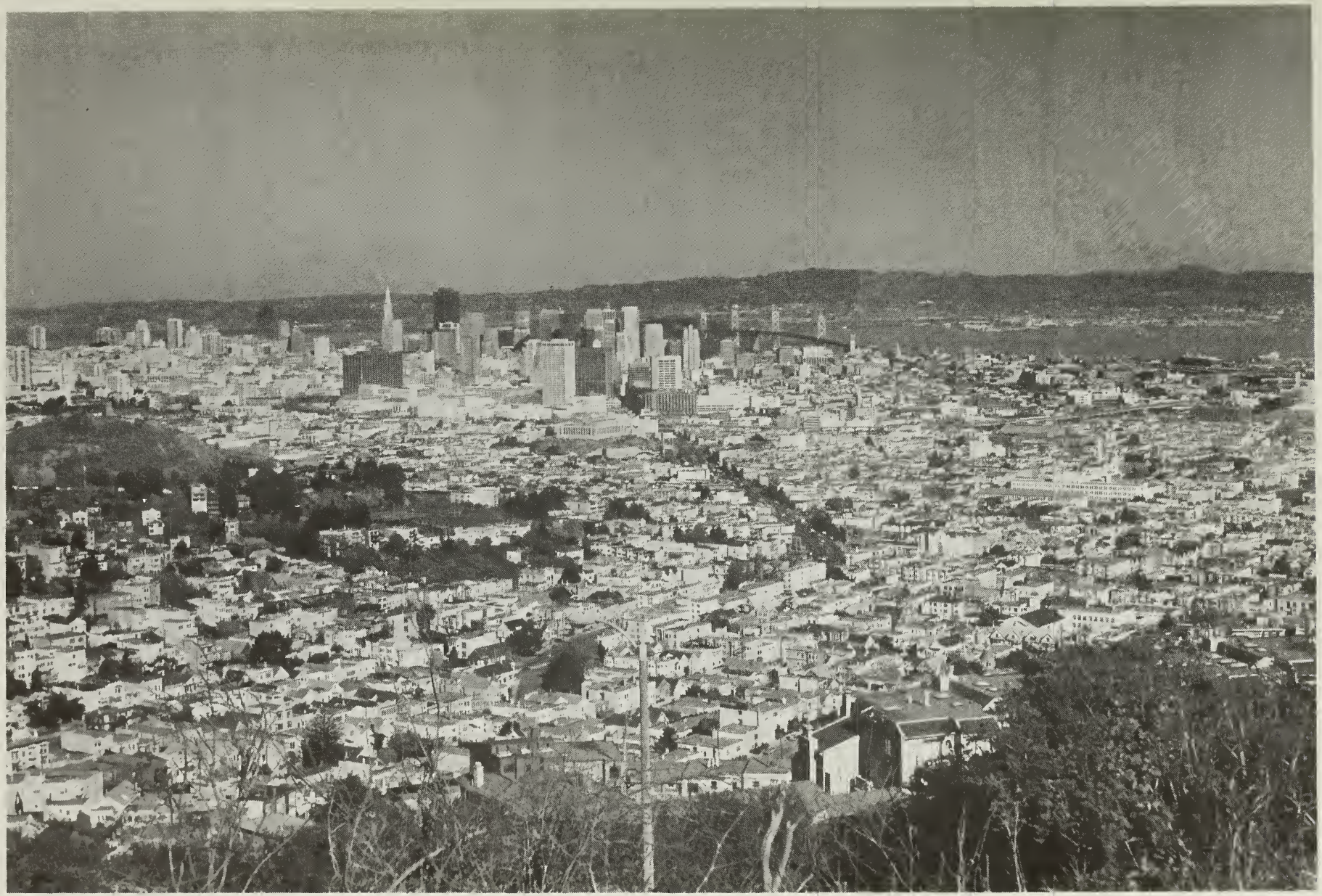


FIGURE CR-2: EXISTING VIEW FROM TWIN PEAKS

FIGURE CR-3: VIEW WITH MODEL FROM TWIN PEAKS

FIGURE CR-4: EXISTING VIEW FROM POTRERO HILL

FIGURE CR-5: VIEW WITH MODEL FROM POTRERO HILL

FIGURE CR-6: EXISTING VIEW FROM TREASURE ISLAND

FIGURE CR-7: VIEW WITH MODEL FROM TREASURE ISLAND

FIGURE CR-8: EXISTING VIEW FROM BERNAL HEIGHTS

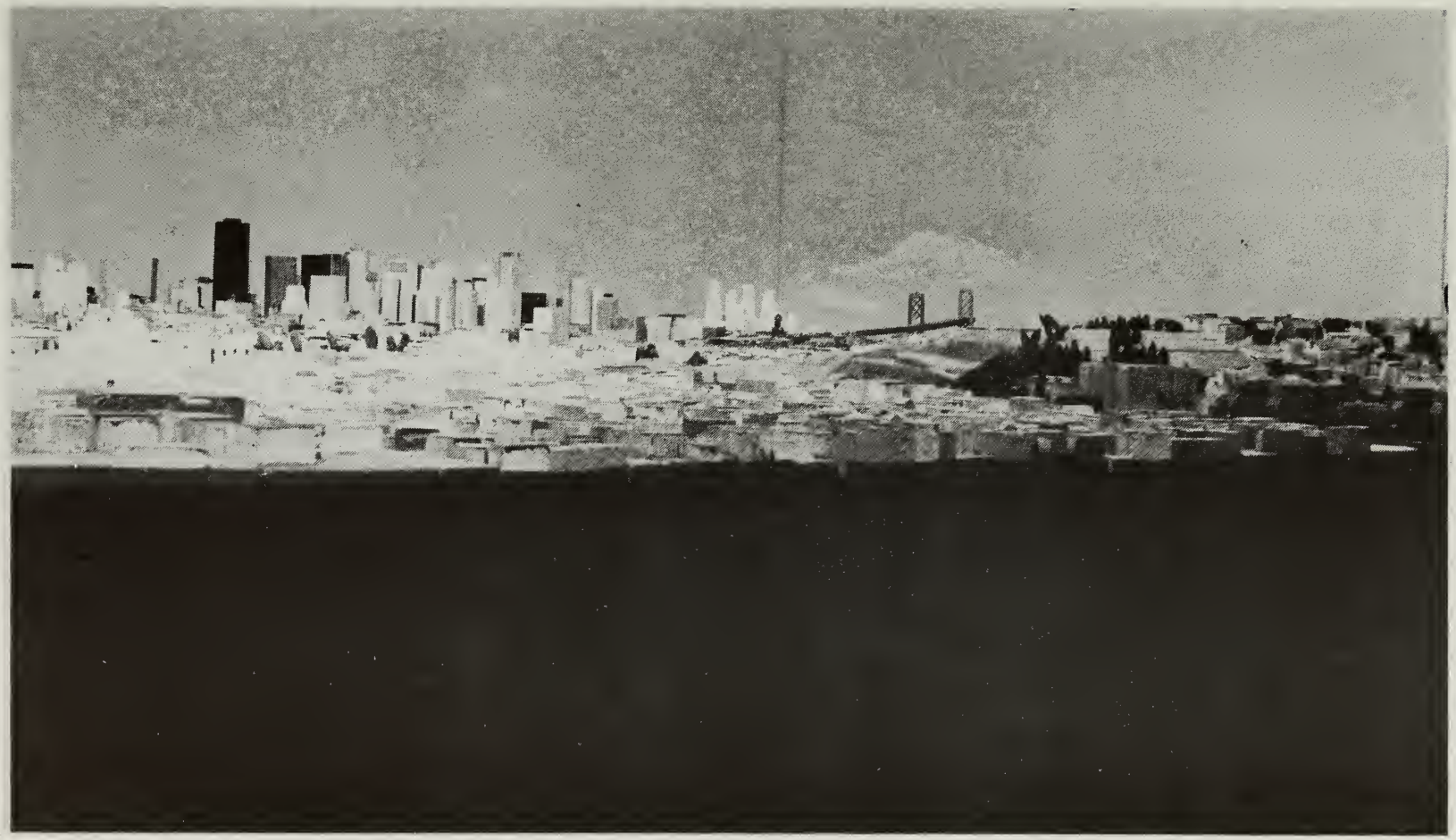


FIGURE CR-9: VIEW WITH MODEL FROM BERNAL HEIGHTS

FIGURE CR-10: EXISTING VIEW FROM DIAMOND HEIGHTS

FIGURE CR-11: VIEW WITH MODEL FROM DIAMOND HEIGHTS

FIGURE CR-12: VIEW OF PLAN AREA FROM SAN BRUNO MOUNTAIN

FIGURE CR-13: PEDESTRIAN LEVEL VIEWS: FIRST STREET, LOOKING NORTHEAST ON FOLSOM STREET, EXISTING

FIGURE CR-14: PEDESTRIAN LEVEL VIEWS: FIRST STREET , LOOKING NORTHEAST ON FOLSOM STREET, WITH MODEL

FIGURE CR-15: PEDESTRIAN LEVEL VIEWS: FIRST STREET, BETWEEN FOLSOM & HARRISON STREETS, LOOKING NORTHEAST, EXISTING

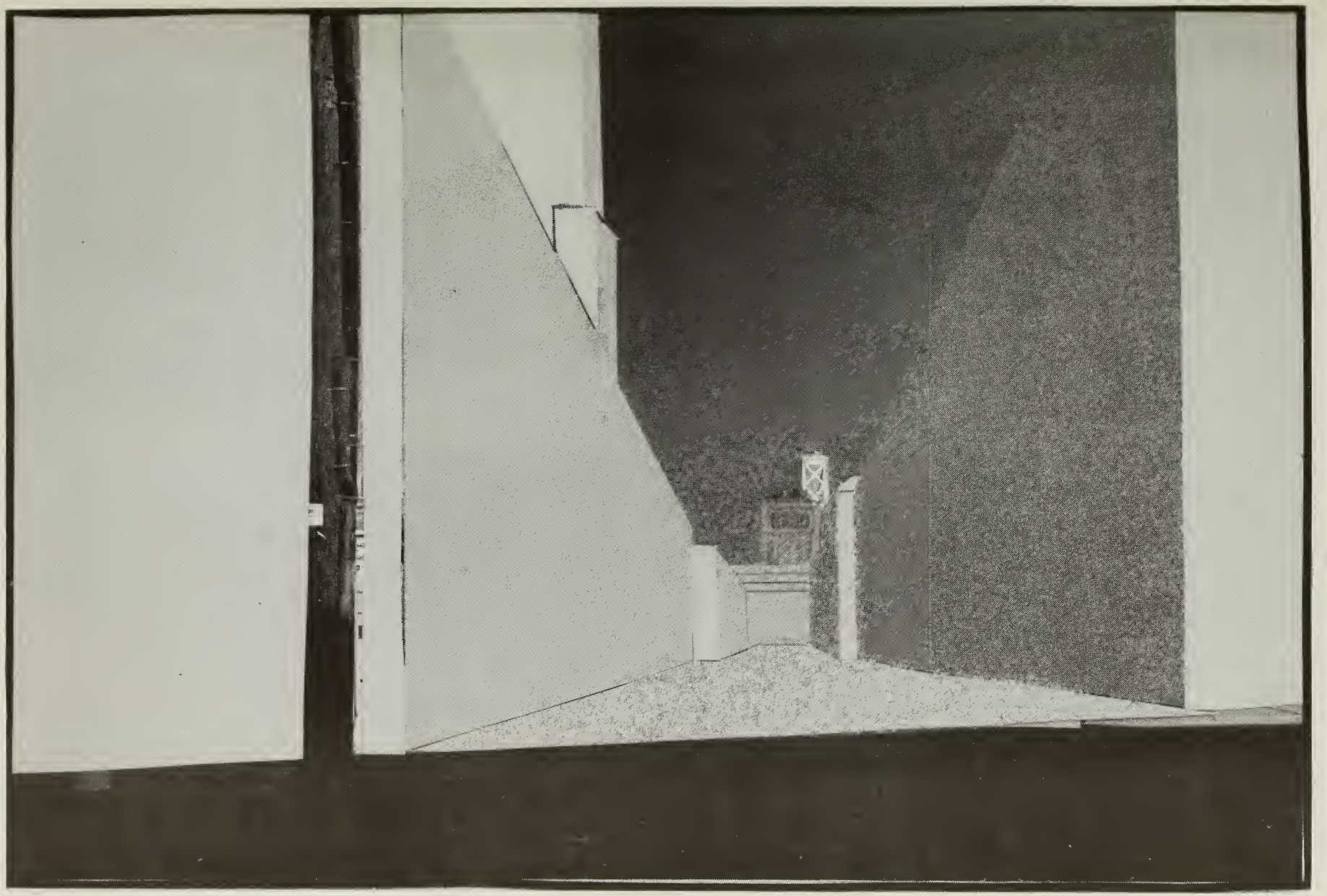


FIGURE CR-16: PEDESTRIAN LEVEL VIEWS: FIRST STREET, BETWEEN FOLSOM AND HARRISON STREETS, LOOKING NORTHEAST DOWN PROPOSED PEDESTRIAN ALLEYWAY, WITH MODEL

FIGURE CR-17: PEDESTRIAN LEVEL VIEWS: FIRST STREET, LOOKING NORTHEAST ON HARRISON STREET, EXISTING

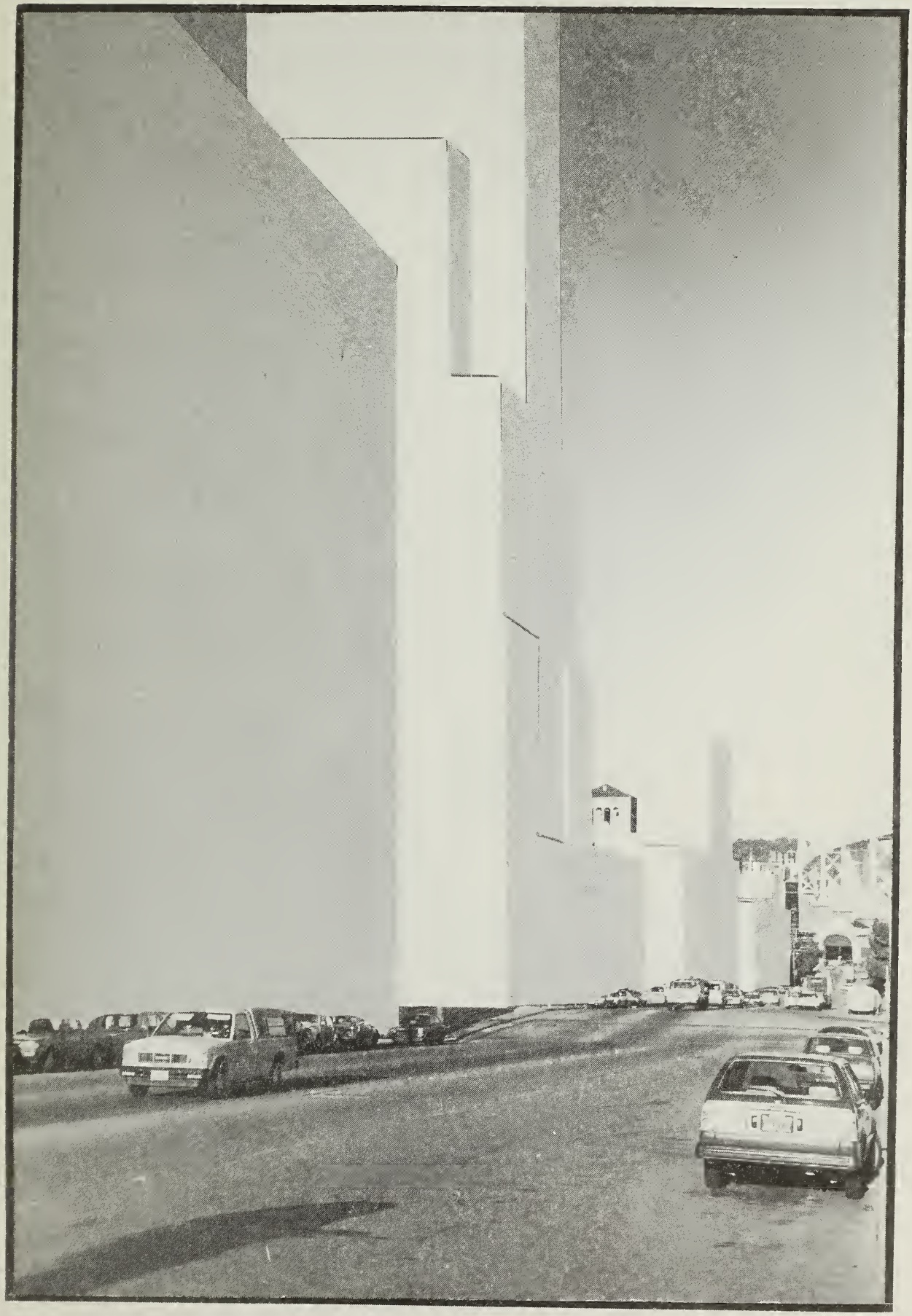


FIGURE CR-18: PEDESTRIAN LEVEL VIEWS: FIRST STREET LOOKING NORTHEAST ON HARRISON STREET, WITH MODEL

FIGURE CR-19: PEDESTRIAN LEVEL VIEWS: FOLSOM STREET , LOOKING SOUTHEAST ON FREMONT STREET, EXISTING

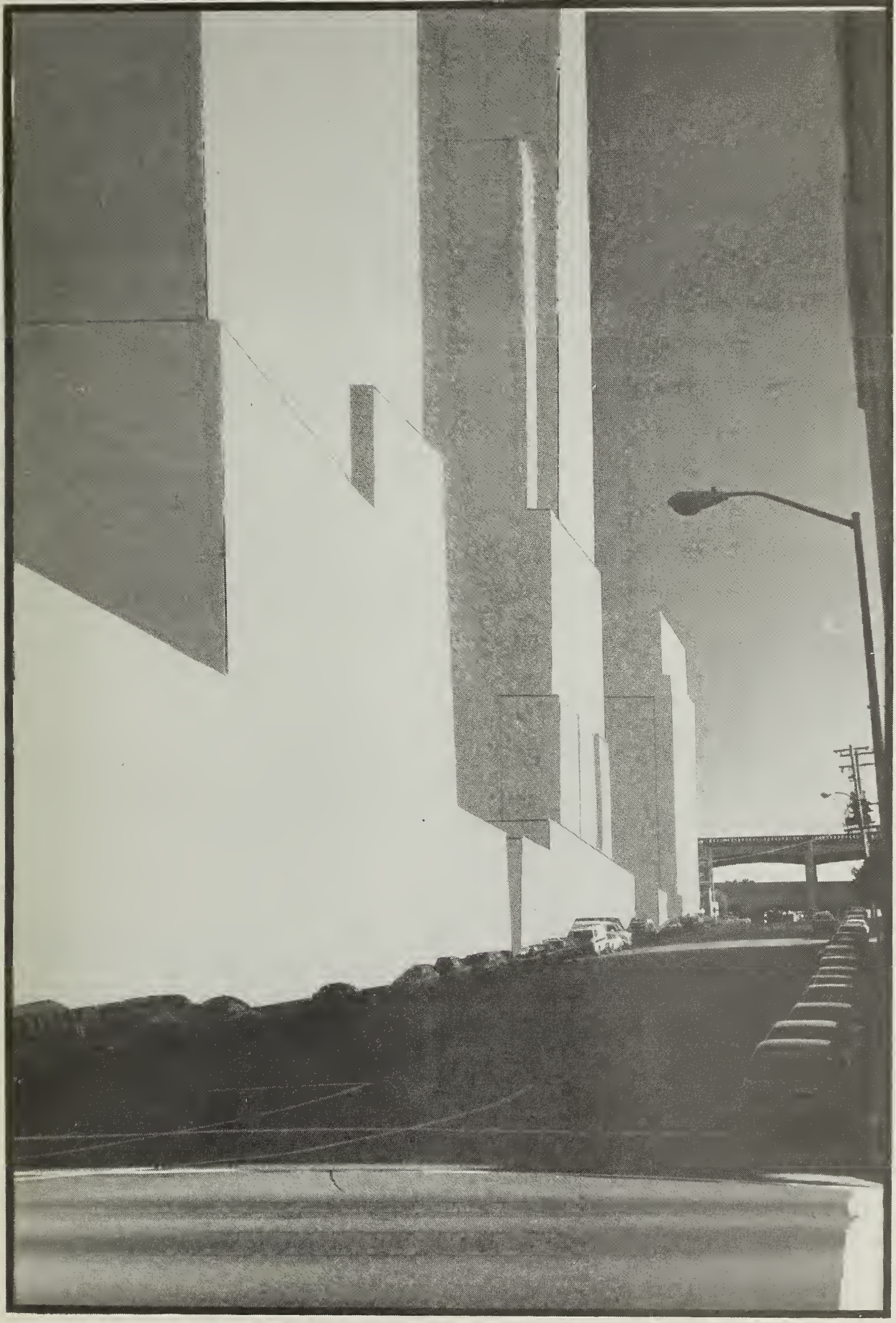


FIGURE CR-20: PEDESTRIAN LEVEL VIEWS : FOLSOM STREET LOOKING SOUTHEAST ON FREMONT STREET, WITH MODEL

FIGURE CR-21: PEDESTRIAN LEVEL VIEWS: FOLSOM STREET LOOKING SOUTHEAST ON BEALE STREET, EXISTING

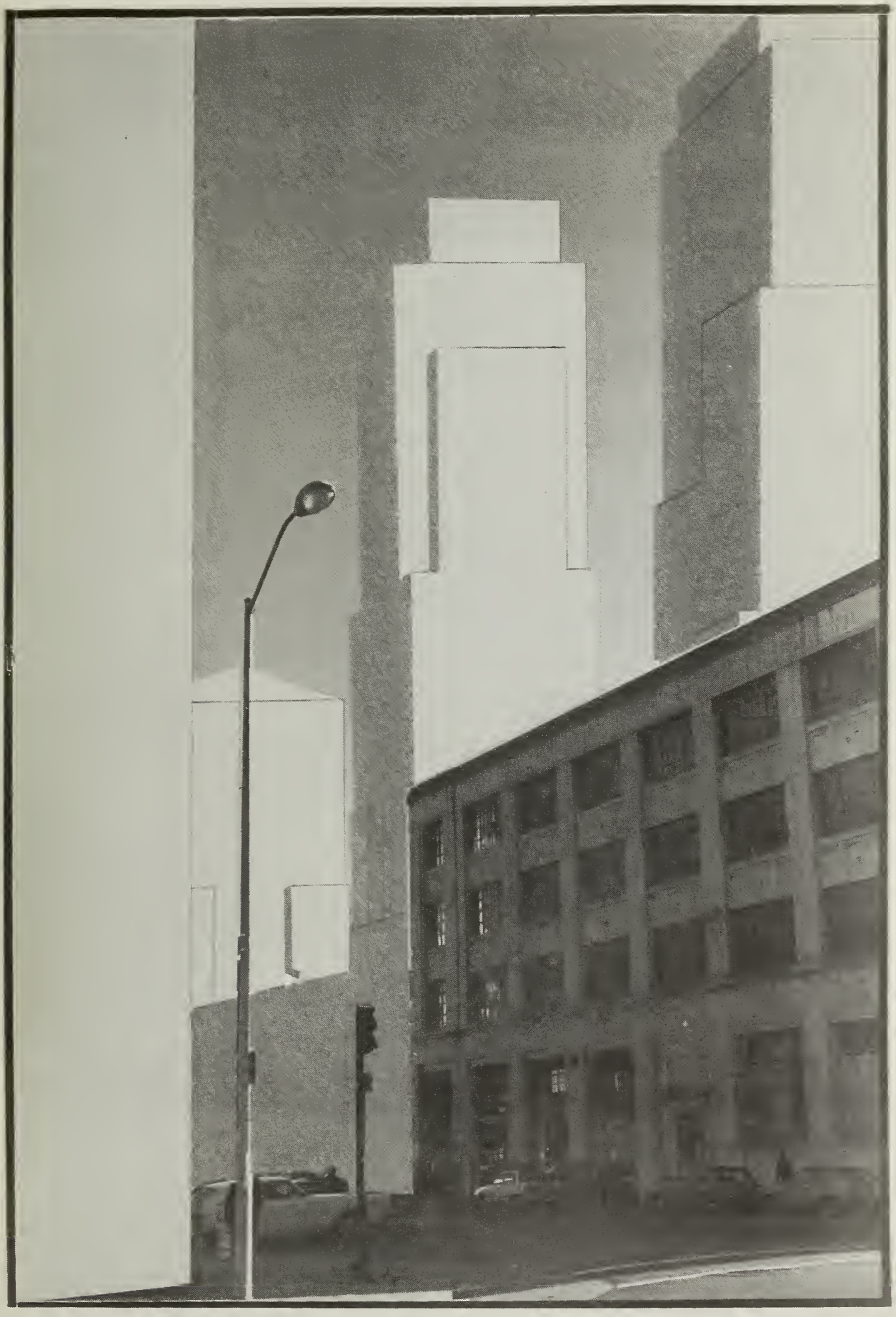


FIGURE CR-22: PEDESTRIAN LEVEL VIEWS: FOLSOM STREET, LOOKING SOUTHEAST ON BEALE STREET, WITH MODEL

FIGURE CR-23: PEDESTRIAN LEVEL VIEWS: MAIN STREET, LOOKING SOUTHWEST ON FOLSOM STREET, EXISTING

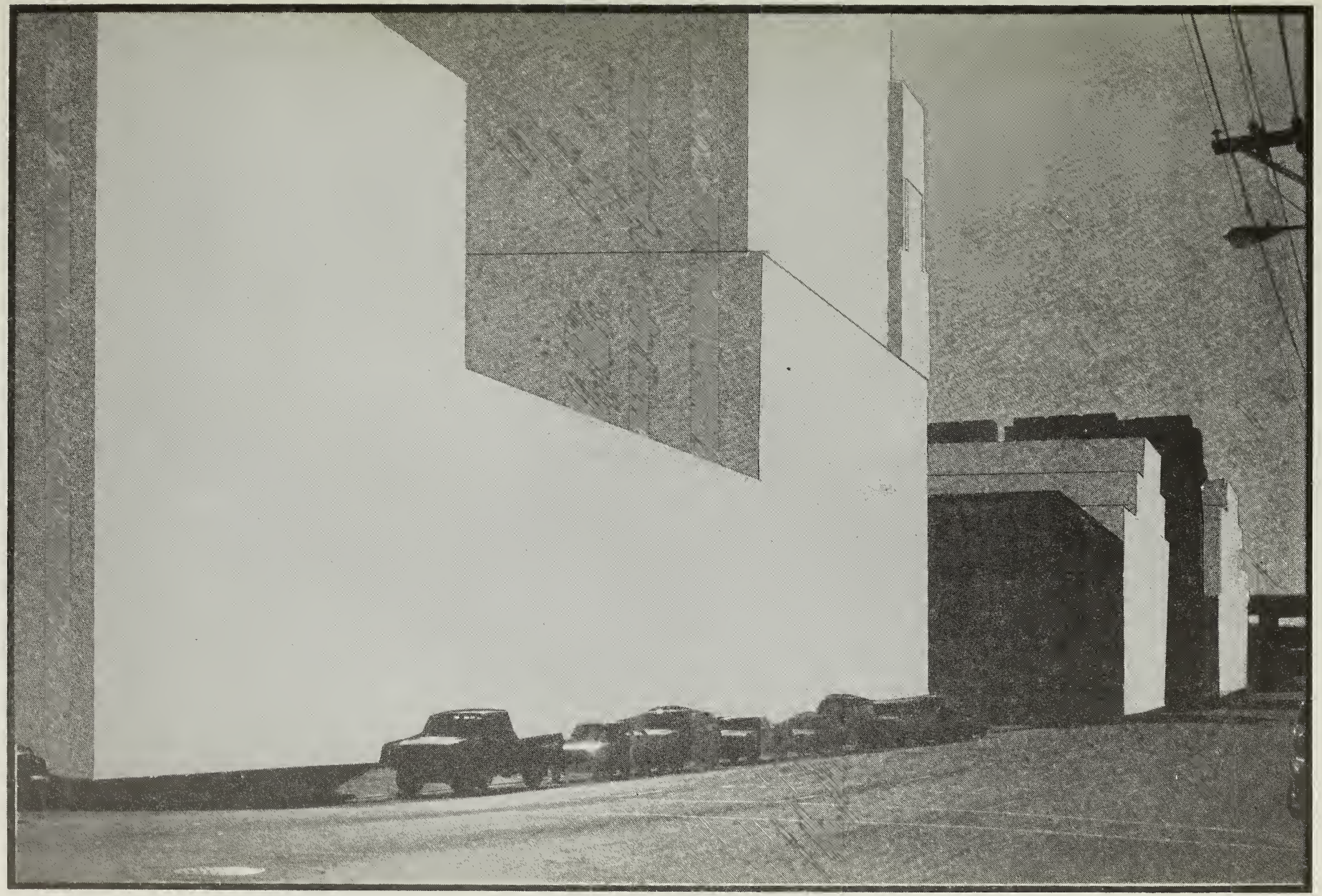


FIGURE CR-24: PEDESTRIAN LEVEL VIEWS: MAIN STREET, LOOKING SOUTHWEST ON FOLSOM STREET, WITH MODEL

FIGURE CR-25: PEDESTRIAN LEVEL VIEWS: MAIN STREET
LOOKING SOUTHWEST ON HARRISON STREET, EXISTING

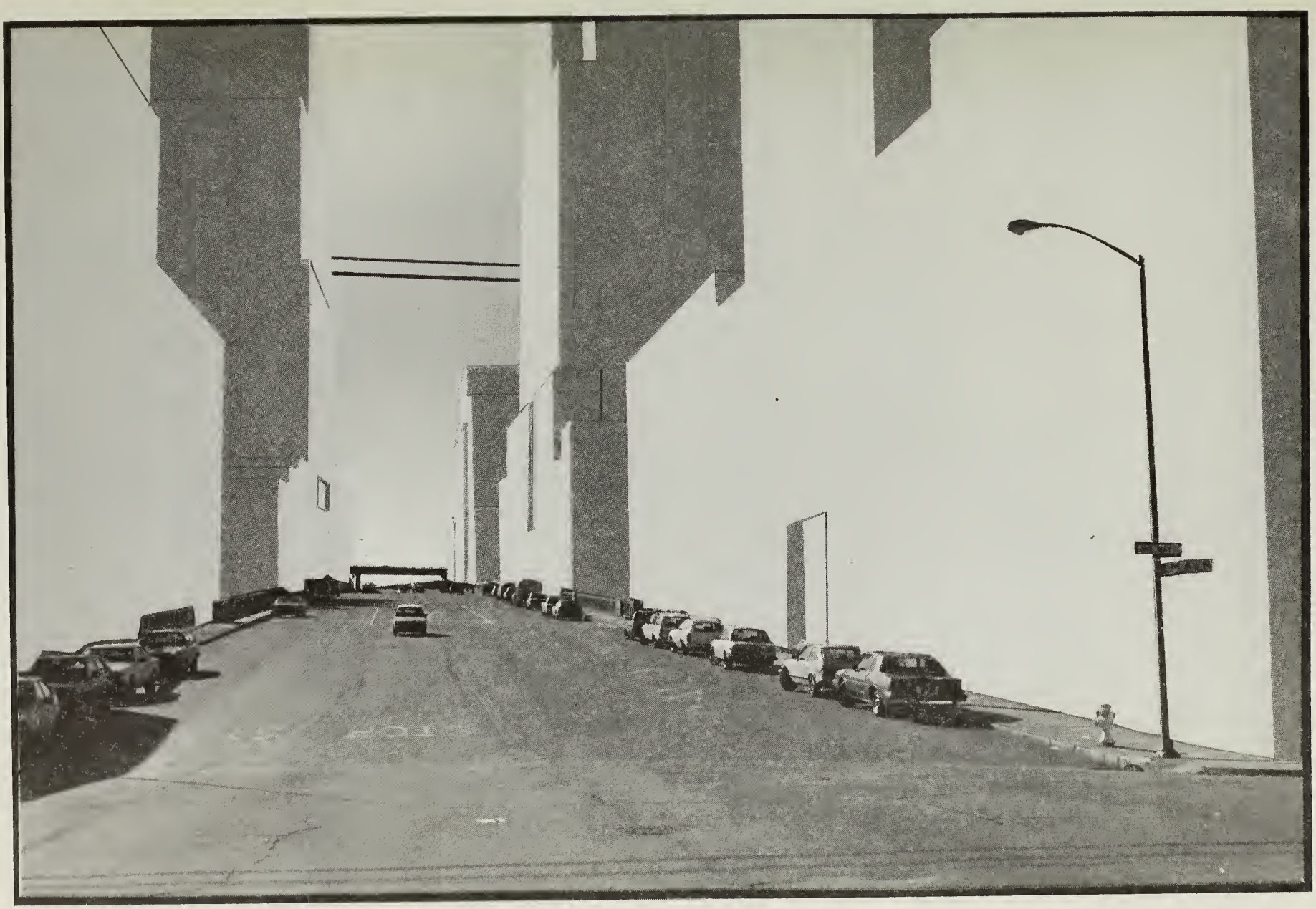


FIGURE CR-26: PEDESTRIAN LEVEL VIEWS: MAIN STREET, LOOKING SOUTHWEST ON HARRISON STREET, WITH MODEL

I think that some way we have to do shadow and wind studies now. We have asked redevelopment to do wind and shadow studies of buildings so we know what effect there is. And we have been critical when they didn't do them early enough, because we have had to vote on things where they were missing. I think it's extremely important for us to know what a 400-foot tower will do, we know where it's going to be. Even given its best configuration, which may or may not be the future case, I think we need to analyze each thing carefully so we know what we are doing before we raise height limits from 105 feet to 400 feet by a Conditional Use.
The same would hold true for wind. I looked in the back at the list of people who have worked on this document, and there are lots of specialists listed. I probably have missed the specialist on wind and shadow, but I didn't find it. I would hope that we are not putting that off too long.

....Page 86 and 87, it seems really not responsible to plan to raise the heights without knowing effects, wind particularly. We know how hard it is to control height once it's set. This page just deals with it more. The open space plan, an overpass will be shadowed. The east-west alley system is shadowed. The rooftops will be shadowed. I do think there is a problem.

The other thing that came to mind was what do the high-rises do to the other buildings -- just their windows? I mean, are we going to create apartments that are low-rise and mid-rise that won't have sunlight because we have done these 400-foot towers?"

Rin Ten Ten

"The wind and shadows section of the EIR Draft is extremely general. Any project of this size should study these issues more thoroughly. The report avoids them with a "chicken-and-the-egg" argument: there are no specific design proposals, therefore, no studies can be made. We disagree. The report clearly sets maximum height and bulk restrictions which, along with the drawings made by the U.C. Students' group and the model by Environmental Simulation Laboratories, could be used as the basis for test design studies."

RESPONSE

In order to provide an example of the types of impacts that could be generated by full build-out of the Rincon Hill Plan, shadow and wind tunnel studies were conducted that are presented in this document. They are based on the same model used for the long-range and pedestrian view studies discussed earlier on pp. 20-21 of this document.

Again, the analysis based on one build-out model cannot provide a precise account of impacts. The information presented expands upon the general description of wind and shadow impact properties as a result of highrise development (pp. 85-87 of the Draft EIR).

The shadow analysis was conducted by shining a lamp, simulating the sun, on the model at three times of the day (10 a.m., 12 noon, 3 p.m.) on the solstice and equinox days, and photographing the shadows cast. This analysis was carried out assuming two height scenarios for Subarea One: the four towers in the build-out model were tested at 200 feet as well as the 400 foot height limit proposed in the Plan. A summary of the impacts, under both height scenarios, is provided in Table CR-2, which describes impacts with respect to the publicly accessible open space opportunities identified in the Plan. Figures CR-26A through CR-44 are the photographs of shadow impacts.

In general, shadows cast in the 200 foot scenario do not differ dramatically from the 400 foot scenario with respect to impacts within the Rincon Hill Plan area. The reduction in height helps primarily by reducing the amount of shading north of the Plan area, across Folsom Street. The most extreme example occurs during the winter solstice, when the sun is at its lowest point in the horizon. In Figure CR-27, the 400 foot tower at 10:00 a.m., the shadows extend further north than those cast by the elevated freeway. By comparison, Figure CR-30, the 200 foot tower at 10:00 a.m., shows shorter shadows cast, that do not extend past the freeway. The impact of these shadows would be primarily the shading of front facades and rooftops of structures in Rincon Hill as well as buildings fronting on the north side of Folsom Street; and rooftop shading of buildings located mid-block between Folsom and Howard Streets. There is no open space in this area.

As the sun moves to the west, casting shadows to the east, shadows from the towers become less distinguishable, because they coincide with those from lower buildings located east of the towers. Thus, portions of sidewalks along Beale, Main and Spear Streets (which under the Plan are encouraged for improvement/pedestrian amenities) would be shaded by lower structures fronting on these streets even if the highrise towers were not built.

TABLE CR-2 : SUMMARY OF RINCON HILL SHADOW ANALYSIS

December 21	400 Foot Towers 10 a.m.	12 noon	3 p.m.	200 Foot Towers 10 a.m.	12 noon	3 p.m.
Rincon Point Park (Redevelopment Agency)	S	S	shadows would cover approx. 25% of the area of the open space	=	=	=
Beale east sidewalk	S	partially shaded	NS	=	=	=
Beale west sidewalk	NS	NS	NS	=	=	=
Main east sidewalk	S	partially shaded	NS	=	=	=
Main west sidewalk	NS	NS	NS	=	=	=
Spear east sidewalk	S	partially shaded	NS	=	=	=
Spear west sidewalk	NS	NS	NS	=	=	=
Pedestrian Overpass	S	NS	NS	=	=	=
Pedestrian alleyways	NS	NS	S	=	=	=
Roof top open space (between Fremont & Beale)	mostly sunny	S	S	=	=	=
Roof top open space (between Beale & Main)	NS	60% shaded by bridge	S	=	=	=
Anchorage open space	NS	NS	NS	=	=	=

S: all in sun *: sun shines directly down the street at this time NS: no sun

=: Impacts from 200 foot towers are same as from 400 foot towers.

TABLE CR-2 : SUMMARY OF RINCON HILL SHADOW ANALYSIS (con't)

March/September 21	400 Foot Towers 10 a.m.	12 noon	3 p.m.	200 Foot Towers 10 a.m.	12 noon	3 p.m.
Rincon Point Park (Redevelopment Agency)	S	S	S	=	=	=
Beale east sidewalk	S*	S	partially shaded by street buildings and N/E & S/E Towers	=	=	partially shaded by street buildings
Beale west sidewalk	S*	NS	NS	=	=	=
Main east sidewalk	S*	S	partially shaded	=	=	=
Main west sidewalk	S*	NS	NS	=	=	=
Spear east sidewalk	S*	S	mostly shaded	=	=	=
Spear west sidewalk	S*	NS	NS	=	=	=
Pedestrian Overpass	S	partially in the sun	NS	=	=	=
Pedestrian Alleyways	NS	mostly sunny-- the two southern towers cast shadows	mostly sunny	=	towers cast a small shadow (mostly sunny)	S
Roof top open space (between Fremont & Beale)	S	S	S	=	=	=
Roof top open space (between Beale & Main)	50% shaded	S	S	=	=	=
Anchorage open space	mostly shaded by bridge	mostly sunny	S	=	=	=

S: all in sun *: sun shines directly down the street at this time NS: no sun

=: Impacts from 200 foot towers are same as from 400 foot towers.

TABLE CR-2 : SUMMARY OF RINCON HILL SHADOW ANALYSIS (con't)

June 21	400 Foot Towers 10 a.m.	12 noon	3 p.m.	200 Foot Towers 10 a.m.	12 noon	3 p.m.
Rincon Point Park (Redevelopment Agency)	S	S	S	=	=	=
Beale east sidewalk	NS	S	S	=	=	=
Beale west sidewalk	S	S	30% shaded	=	=	=
Main east sidewalk	NS	S	S	=	=	=
Main west sidewalk	S	S	35% shaded	=	=	=
Spear east sidewalk	NS	S	S	=	=	=
Spear west sidewalk	S	S	30% shaded	=	=	=
Pedestrian Overpass	S	S	mostly shaded	mostly sunny	=	=
Pedestrian Alleyways	About 60% shaded	about 10% shaded	S	=	about 5% shaded	=
Roof top open space (between Fremont & Beale)	S	S	S	=	=	=
Roof top open space (between Beale & Main)	5% shadow, decreasing through the next 3 hours	S	S	=	=	=
Anchorage open space	50% sunny-- decreasing shadow through the next 2 hours	S	S	=	=	=

S: all in sun *: sun shines directly down the street at this time NS: no sun

=: Impacts from 200 foot towers are same as from 400 foot towers.

✱ PROPOSED PARK SITE OF RINCON POINT/SOUTH BEACH REDEVELOPMENT PLAN

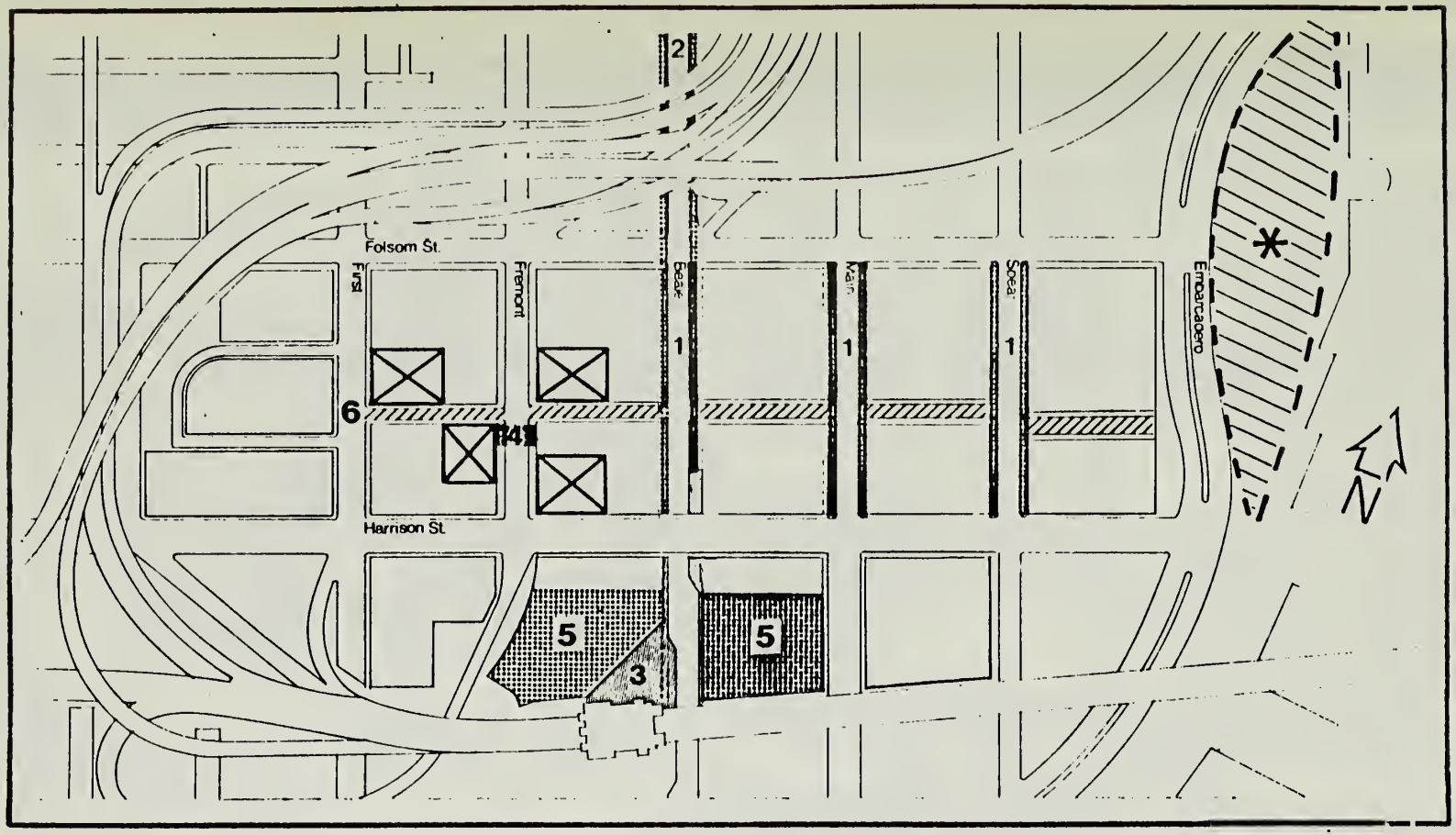


FIGURE CR-26A: LOCATION GUIDE FOR SHADOW IMPACT PHOTOGRAPHS

LEGEND:

1. SIDEWALK WIDENING, STREET BEAUTIFICATION
2. SIDEWALK WIDENING, STREET BEAUTIFICATION, TO CREATE PEDESTRIAN CORRIDOR TO FINANCIAL DISTRICT.
3. PRESERVE OPEN SPACE AROUND BAY BRIDGE ANCHORAGE
4. CREATION OF WIDE PEDESTRIAN OVERPASS
5. RECREATION FACILITIES ON ROOFTOPS OF POTENTIAL INTERCEPT PARKING STRUCTURES
6. CREATION OF A PEDESTRIAN STREET NETWORK

☒ SITE OF HIGH-RISE RESIDENTIAL TOWERS IN THE MODEL BY DANIEL SOLOMAN & ASSOCIATES (TESTED AT 200 & 400 FOOT HEIGHTS)

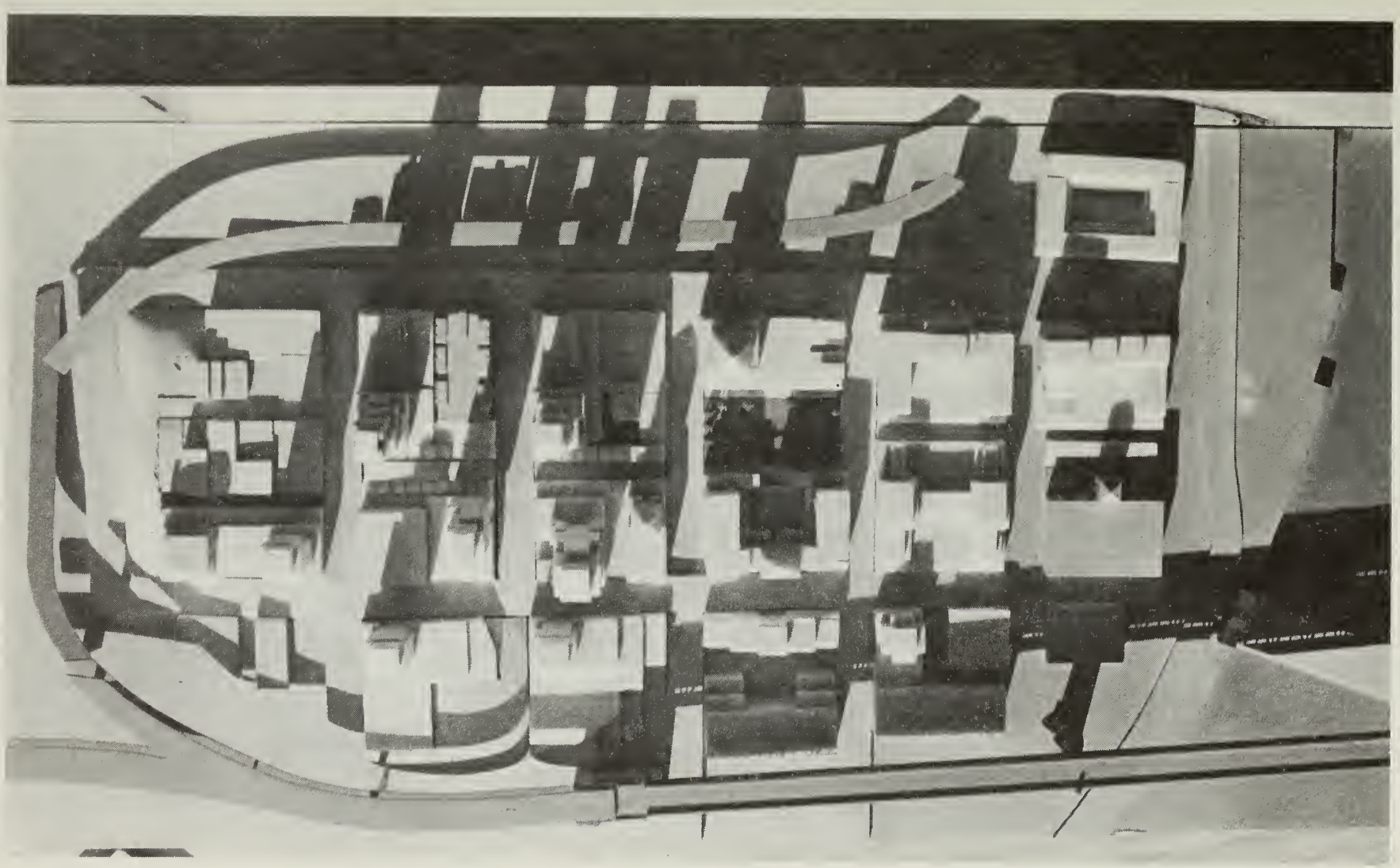


FIGURE CR-27: DECEMBER 21: 10AM, 400 FOOT TOWERS

FIGURE CR-28: DECEMBER 21: 12 NOON, 400 FOOT TOWERS

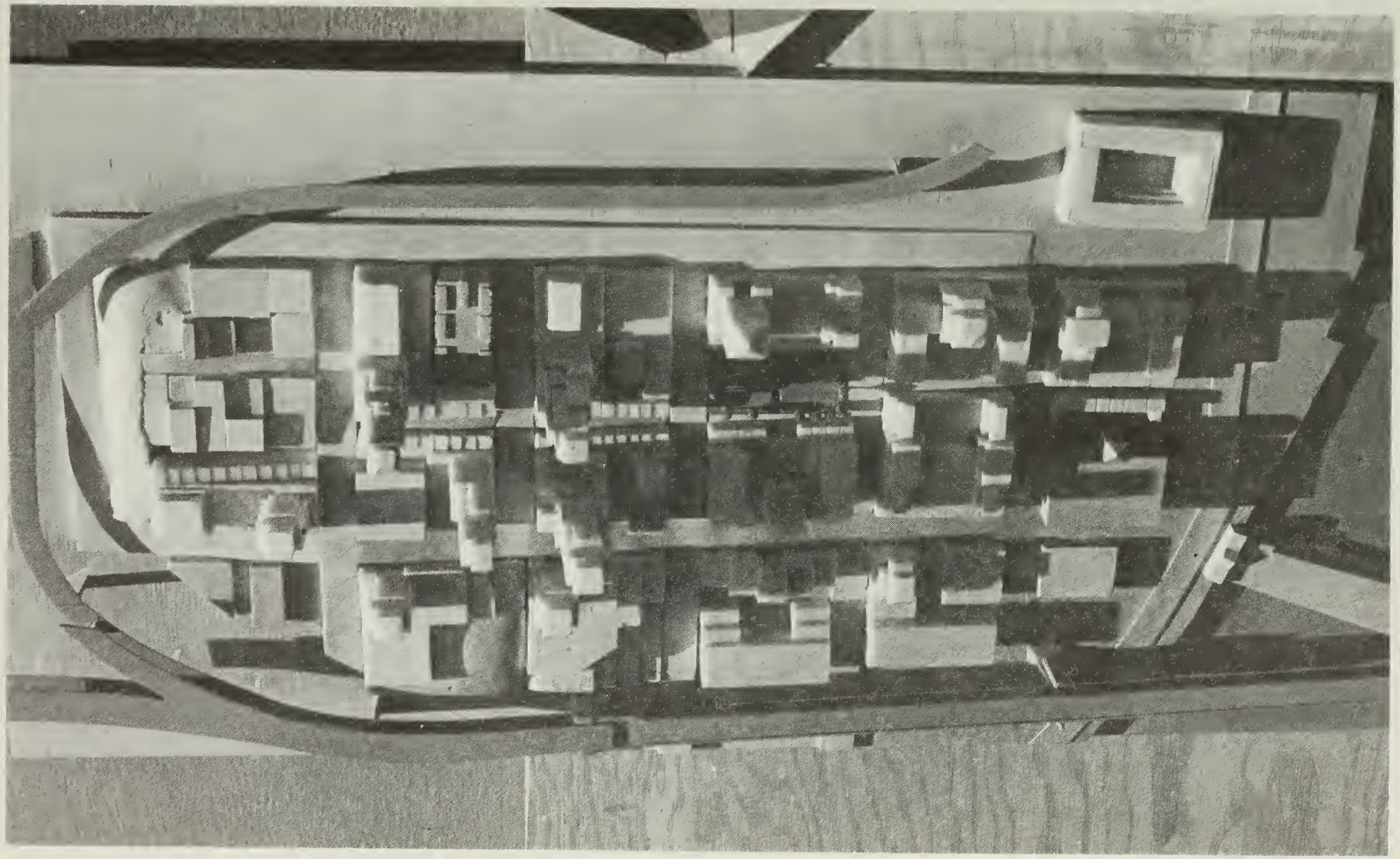


FIGURE CR-29: DECEMBER 21: 3PM, 400 FOOT TOWERS

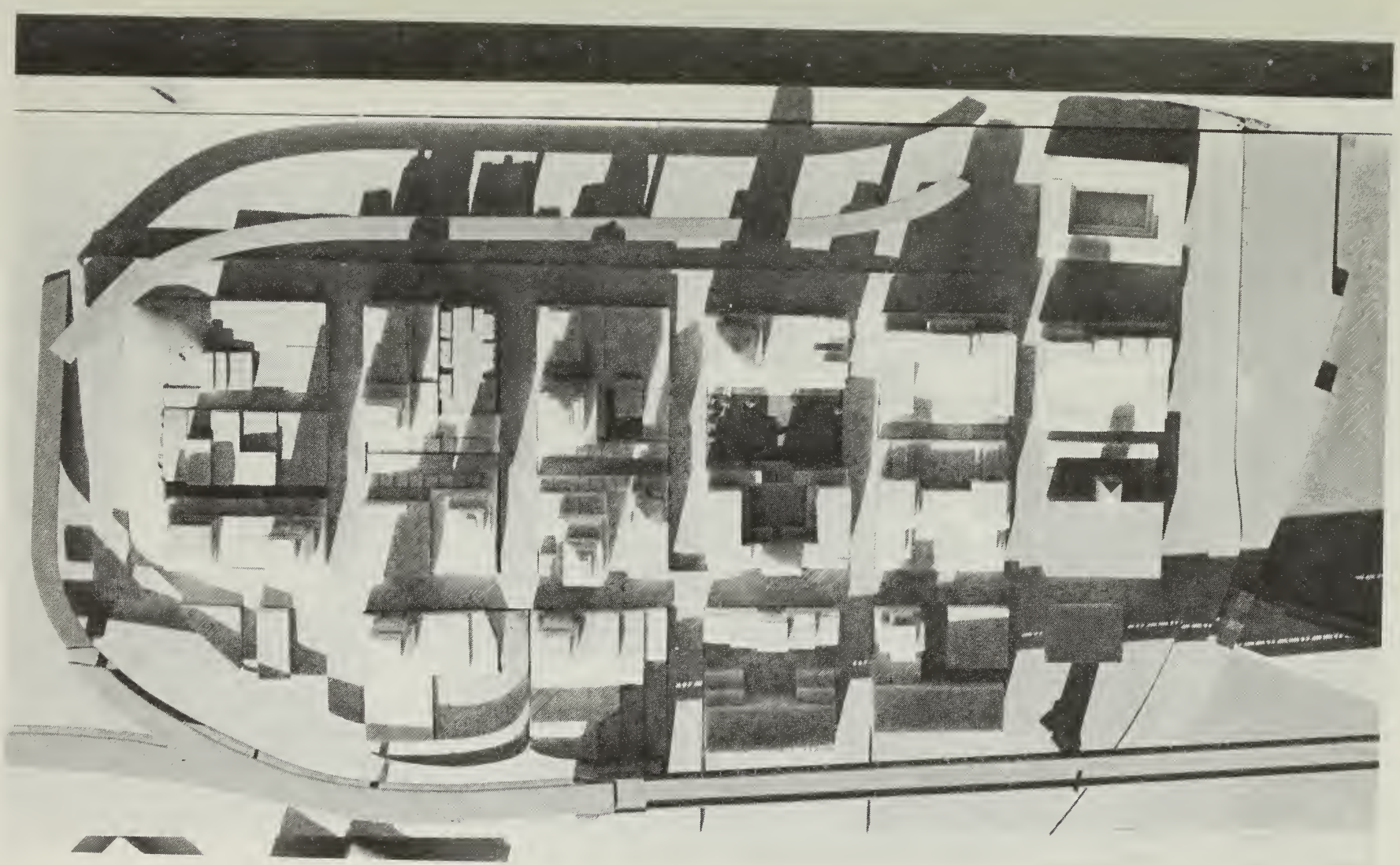


FIGURE CR-30: DECEMBER 21: 10 AM, 200 FOOT TOWERS

FIGURE CR-31: DECEMBER 21: 12 NOON, 200 FOOT TOWERS

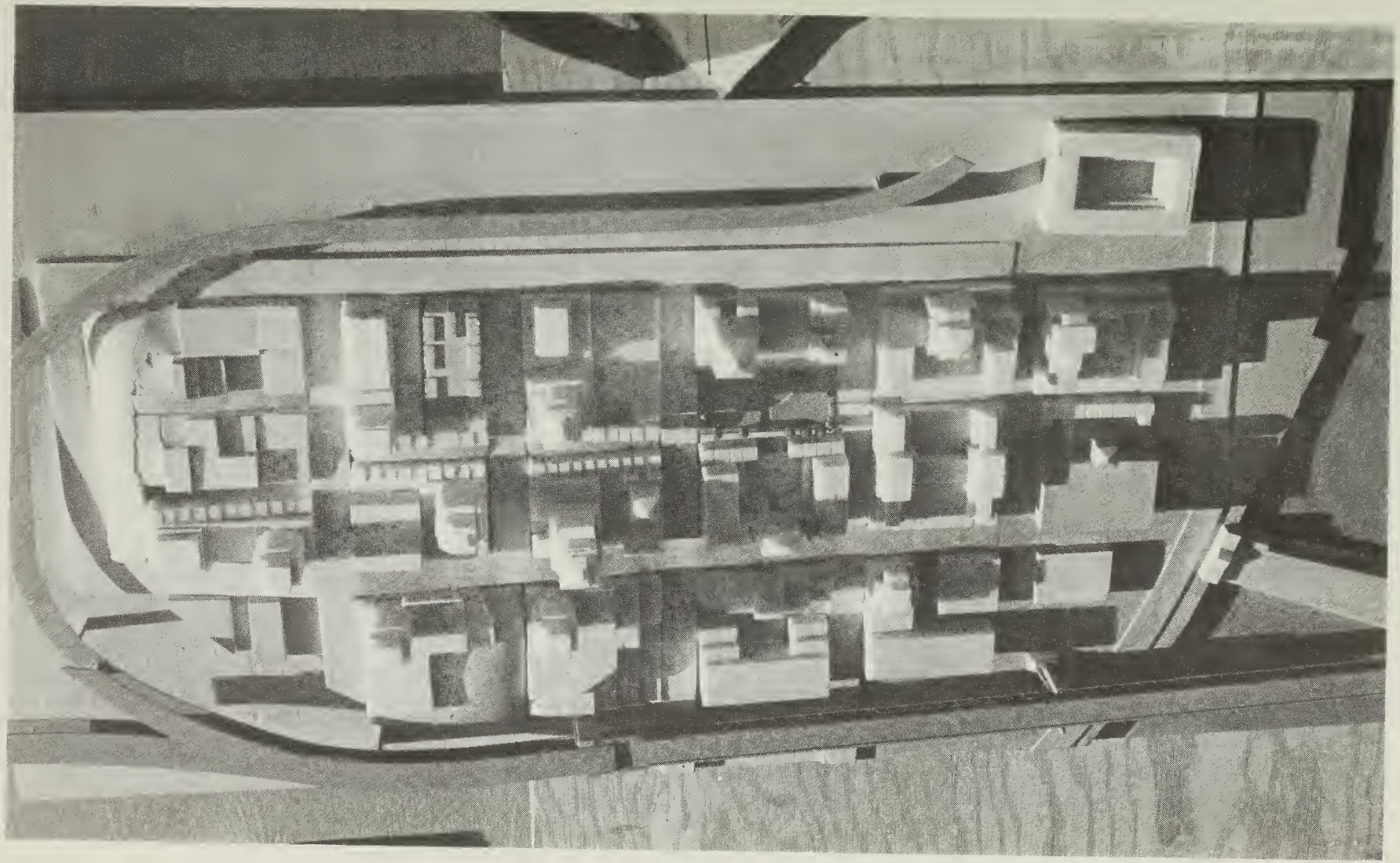


FIGURE CR-32: DECEMBER 21: 3PM., 200 FOOT TOWERS

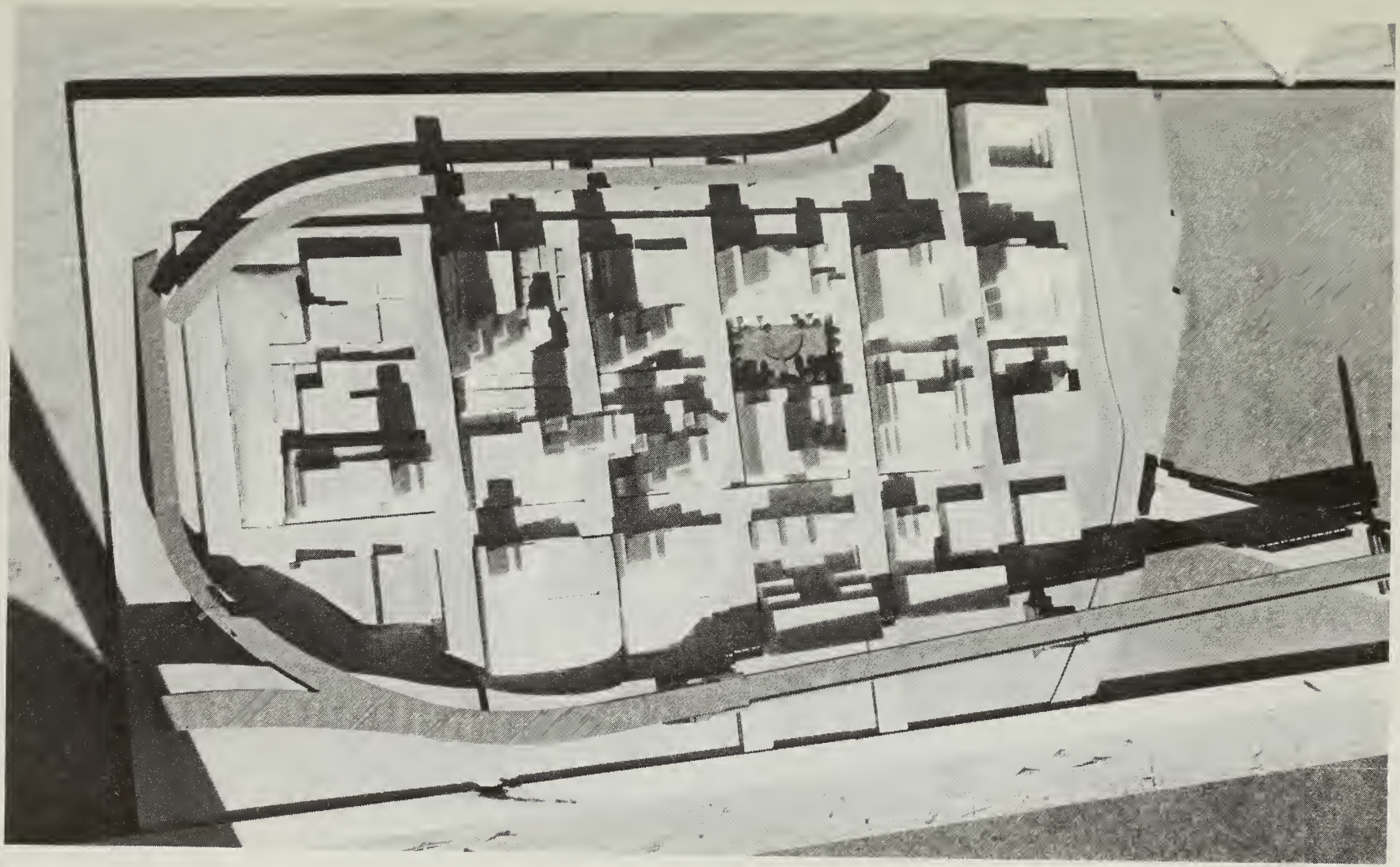


FIGURE CR-33: MARCH/SEPTEMBER 21*: 10AM, 400 FOOT TOWERS

* DUE TO DAYLIGHT SAVINGS TIME, SEPTEMBER SHADOWS WOULD ACTUALLY OCCUR APPROXIMATELY ONE HOUR AFTER TIME NOTED

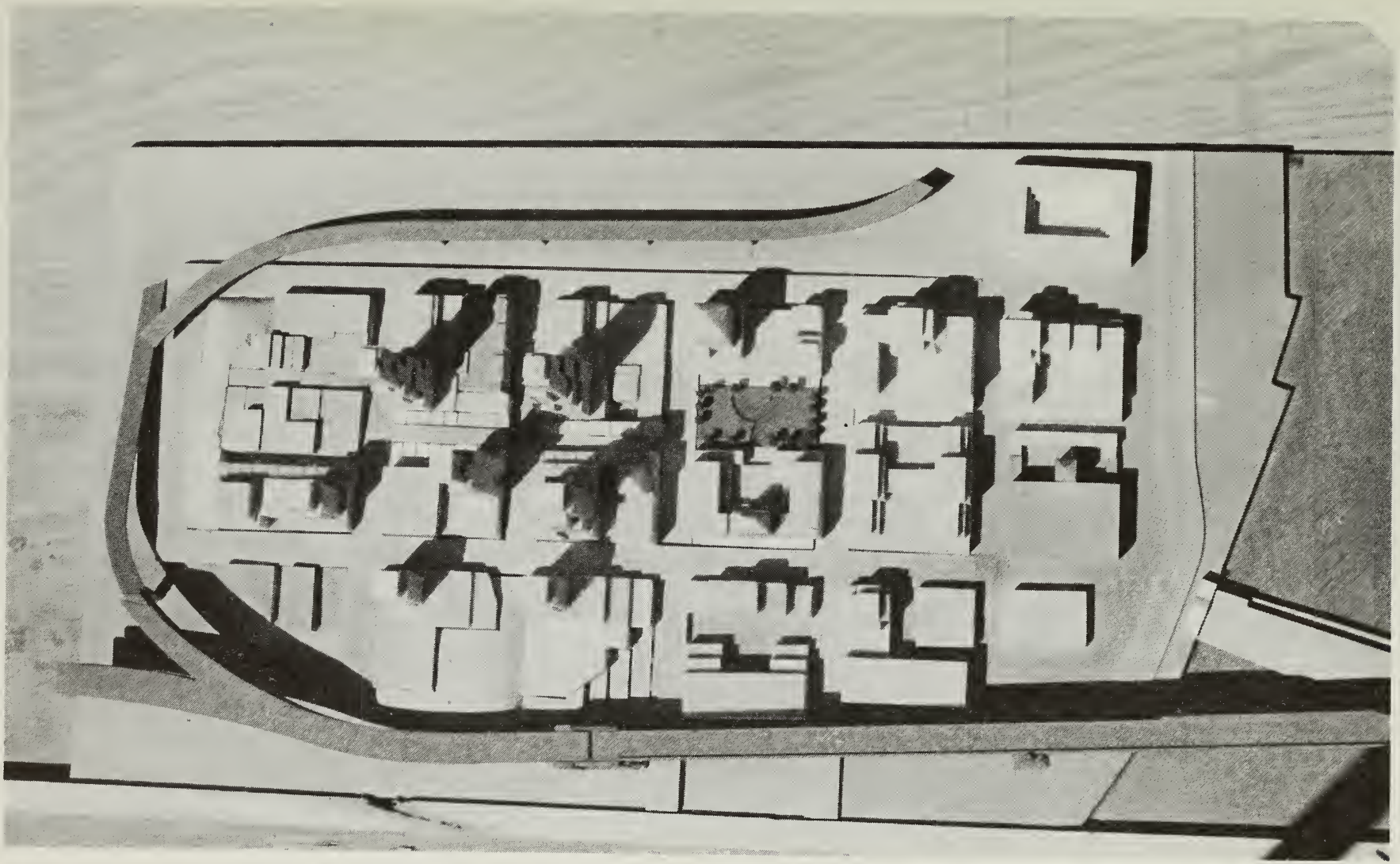


FIGURE CR-34: MARCH/SEPTEMBER 21*: 12 NOON, 400 FOOT TOWERS

* DUE TO DAYLIGHT SAVINGS TIME, SEPTEMBER SHADOWS WOULD ACTUALLY OCCUR APPROXIMATELY ONE HOUR AFTER TIME NOTED

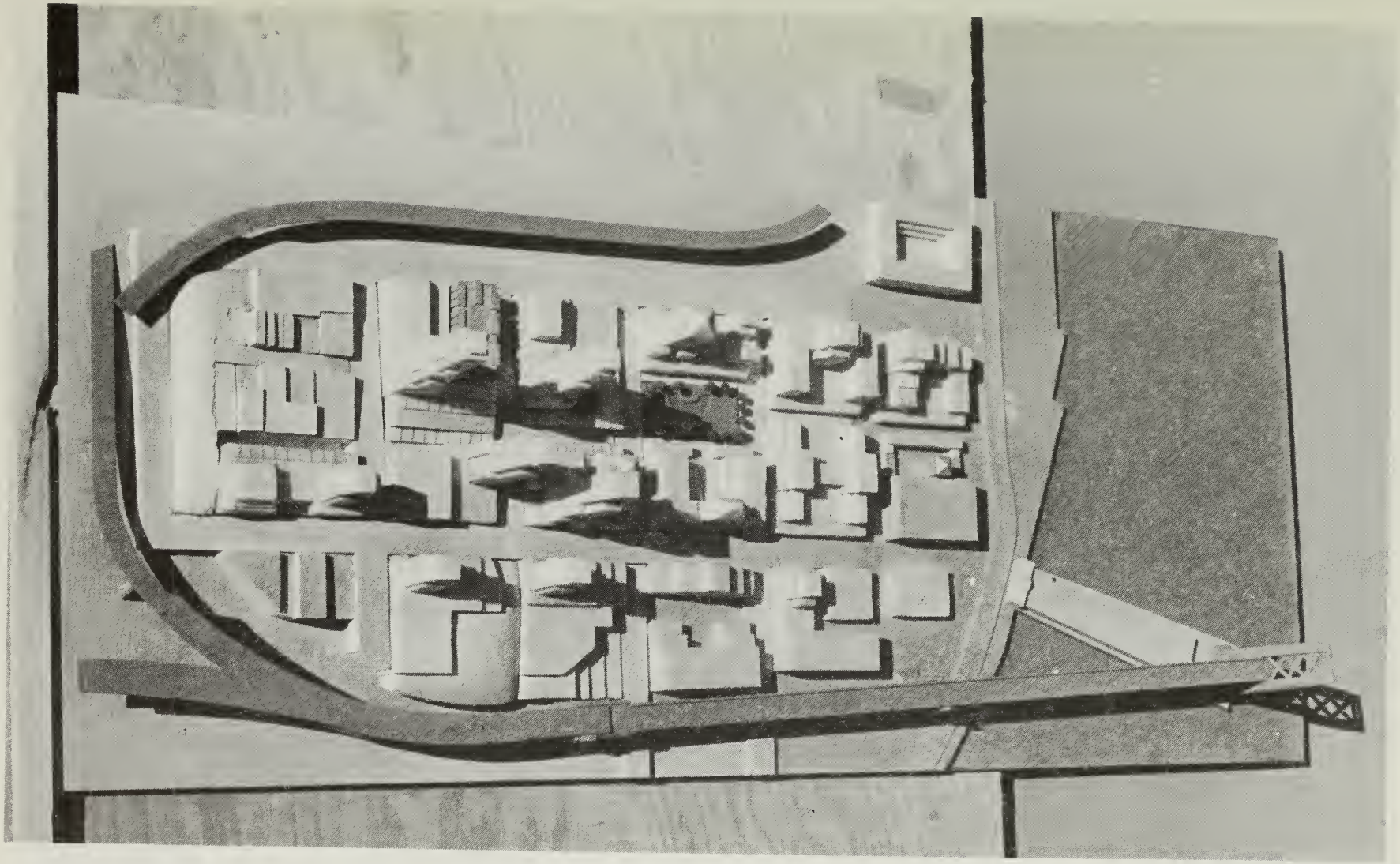


FIGURE CR-35: MARCH/SEPTEMBER 21*: 3PM, 400 FOOT TOWERS

* DUE TO DAYLIGHT SAVINGS TIME, SEPTEMBER SHADOWS WOULD ACTUALLY OCCUR APPROXIMATELY ONE HOUR AFTER TIME NOTED

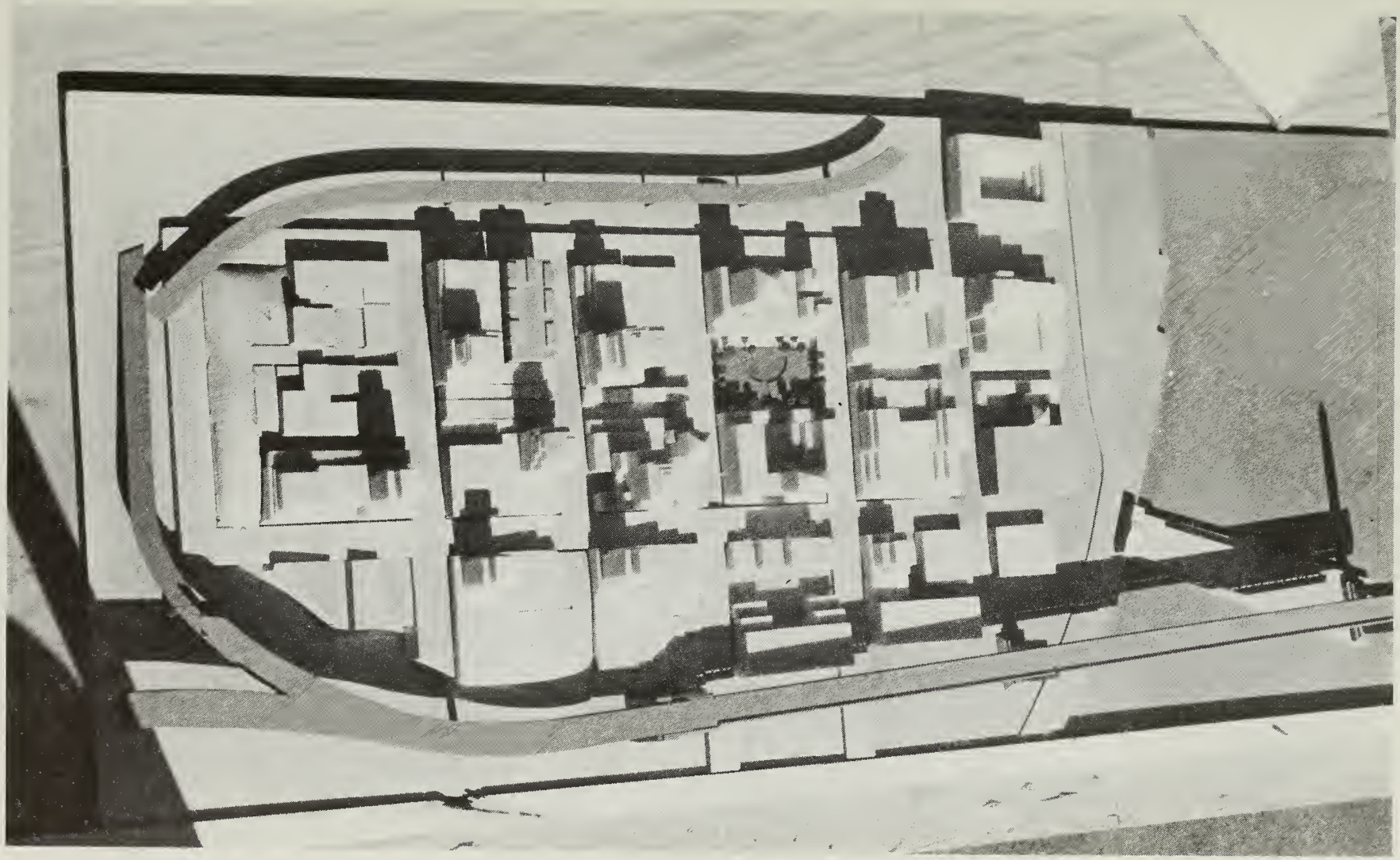


FIGURE CR-36: MARCH/SEPTEMBER 21*: 10AM, 200 FOOT TOWERS

* DUE TO DAYLIGHT SAVINGS TIME, SEPTEMBER SHADOWS WOULD ACTUALLY OCCUR APPROXIMATELY ONE HOUR AFTER TIME NOTED

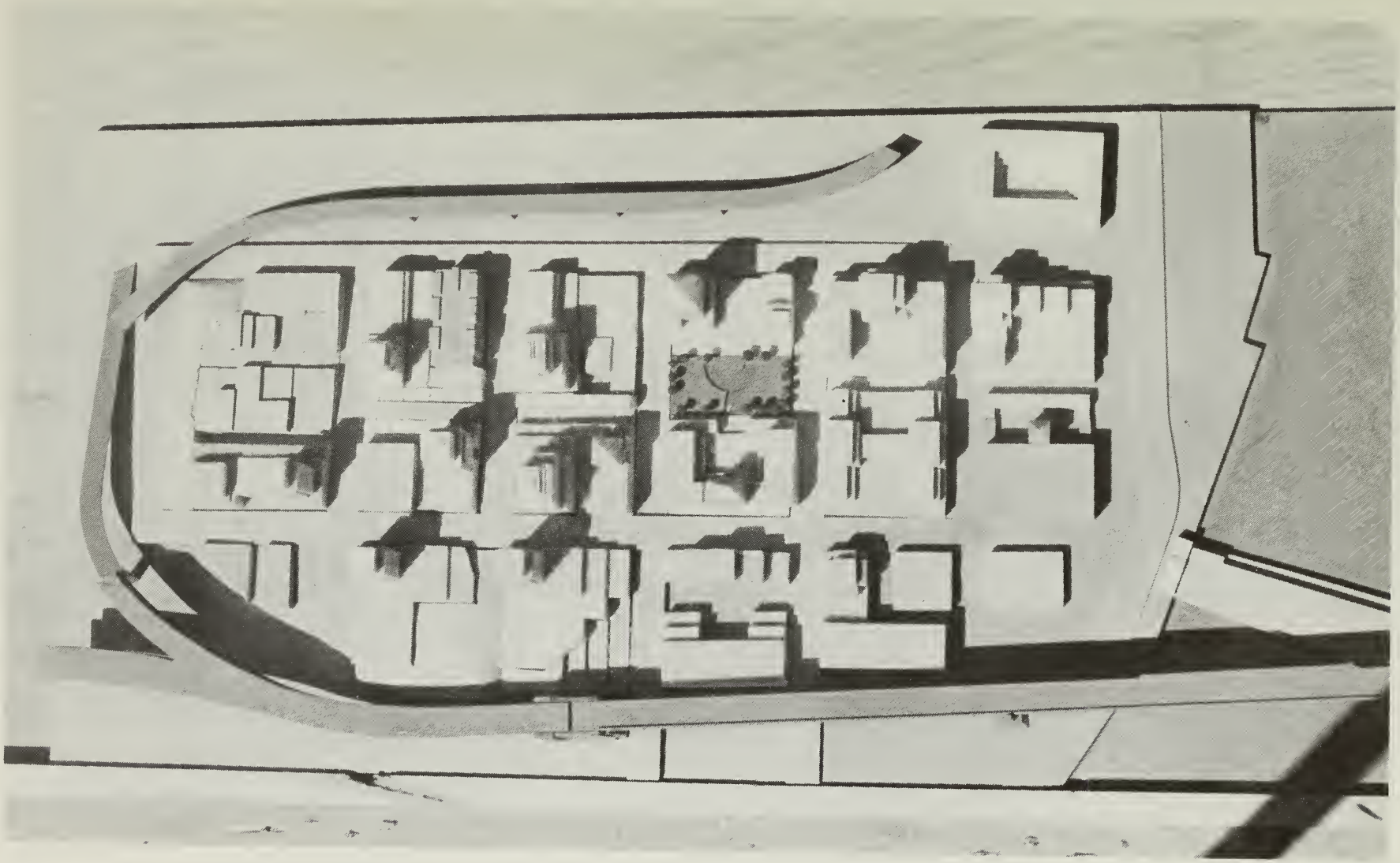


FIGURE CR-37: MARCH/SEPTEMBER 21*: 12 NOON, 200 FOOT TOWERS

* DUE TO DAYLIGHT SAVINGS TIME, SEPTEMBER SHADOWS WOULD ACTUALLY OCCUR APPROXIMATELY ONE HOUR AFTER TIME NOTED

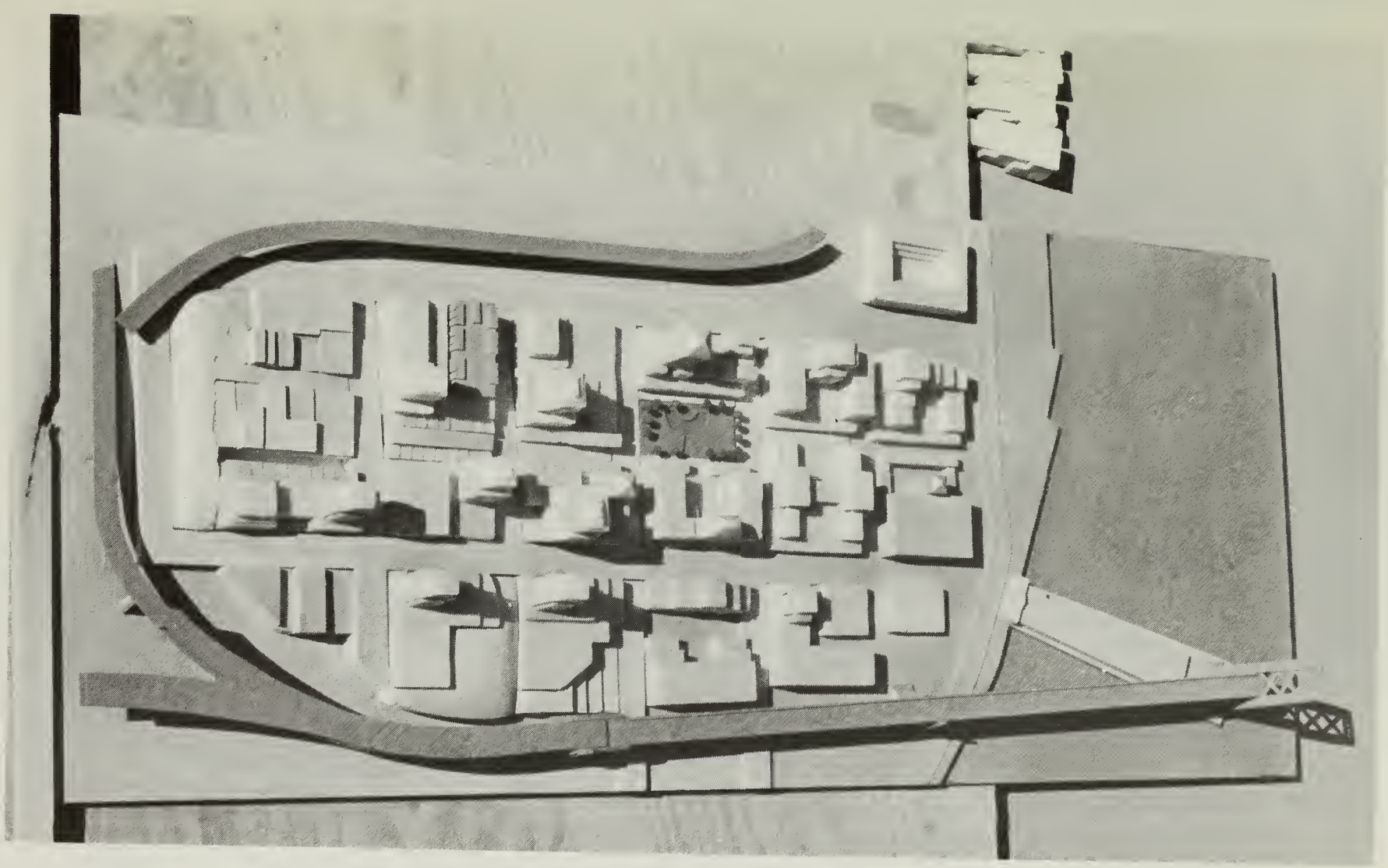


FIGURE CR-38: MARCH/SEPTEMBER 21*: 3PM, 200 FOOT TOWERS

* DUE TO DAYLIGHT SAVINGS TIME, SEPTEMBER SHADOWS WOULD ACTUALLY OCCUR APPROXIMATELY ONE HOUR AFTER TIME NOTED

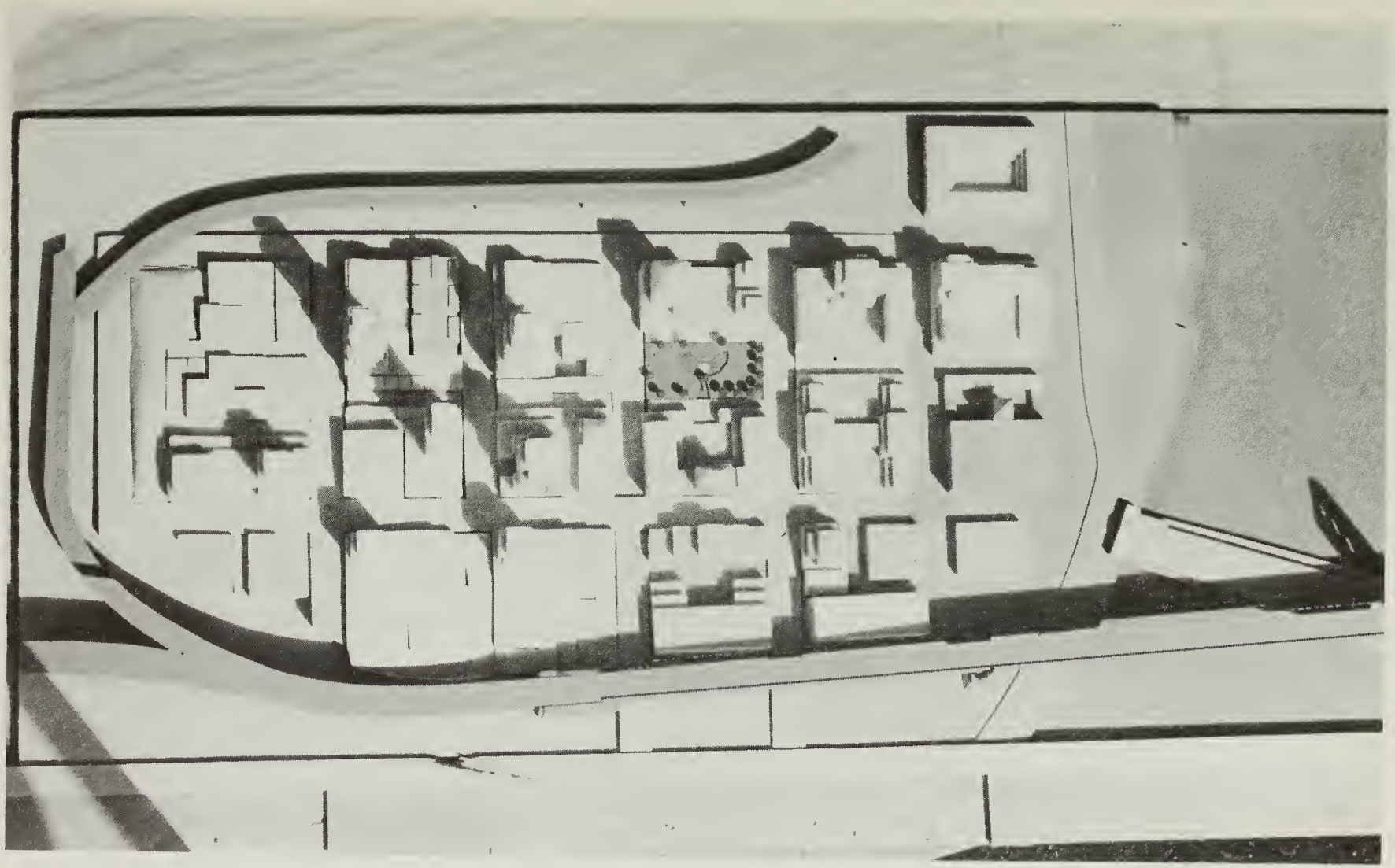


FIGURE CR-39: JUNE 21: 10AM, 400 FOOT TOWERS

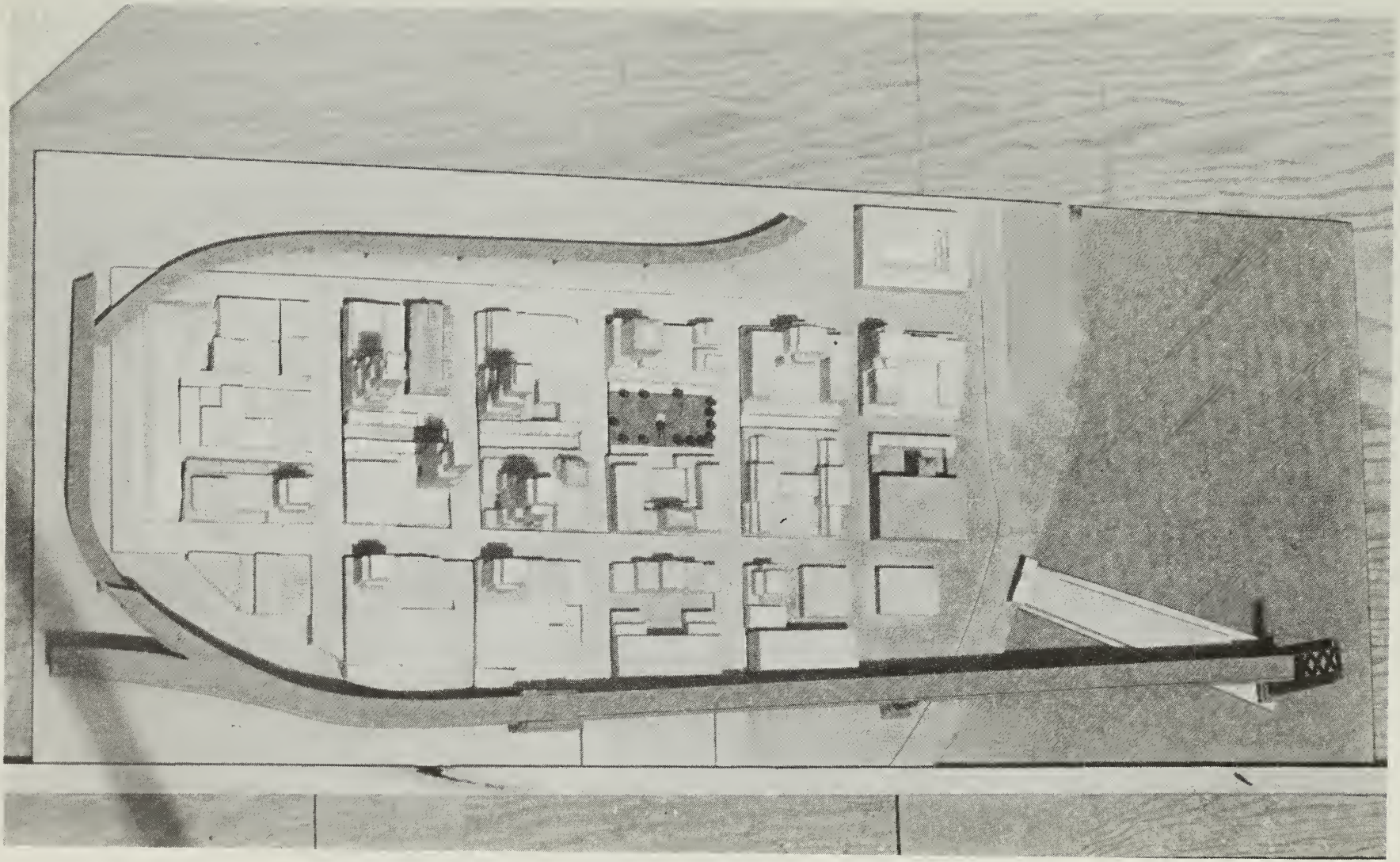


FIGURE CR-40: JUNE 21: 12 NOON, 400 FOOT TOWERS

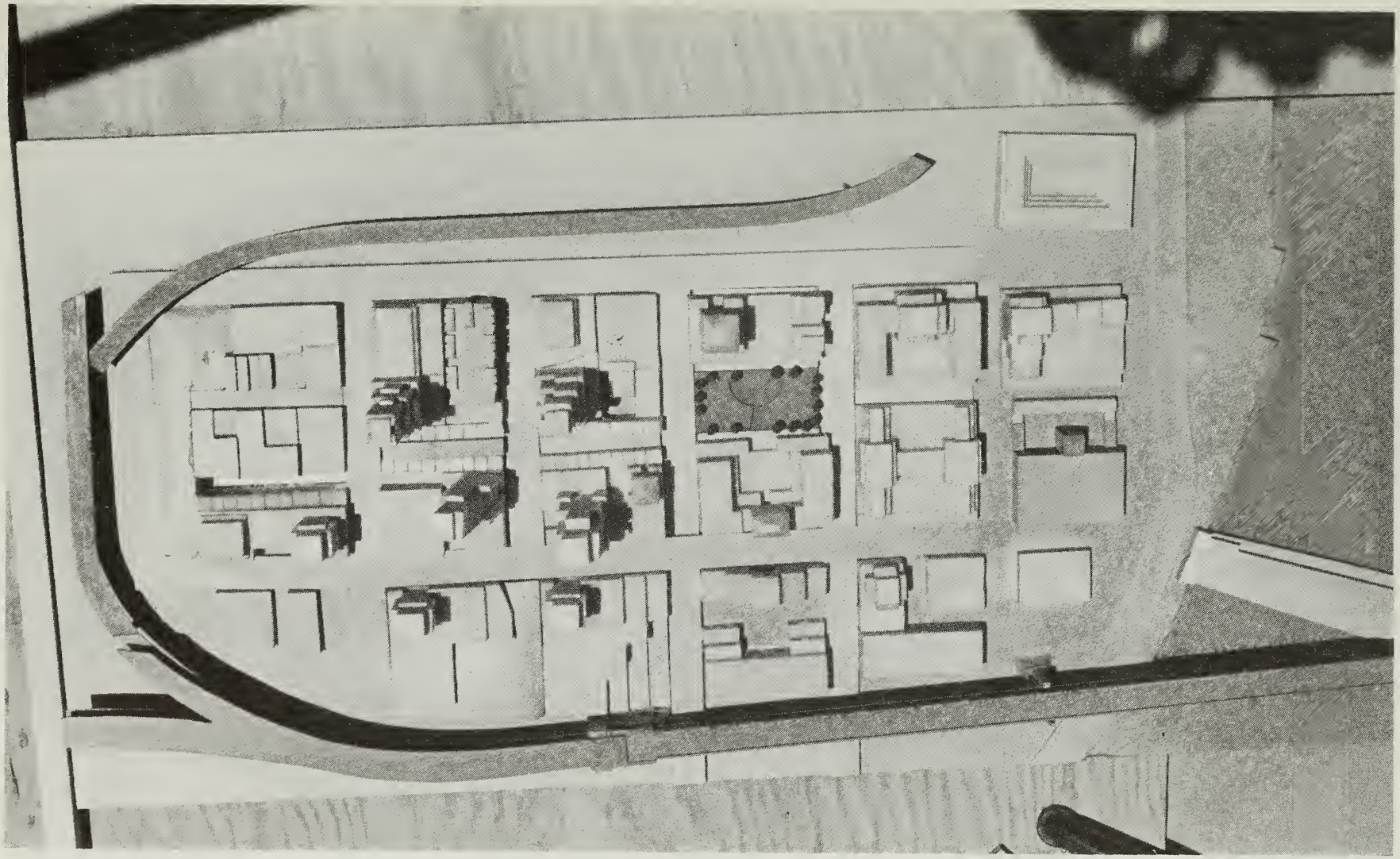


FIGURE CR-41: JUNE 21: 3PM, 400 FOOT TOWERS

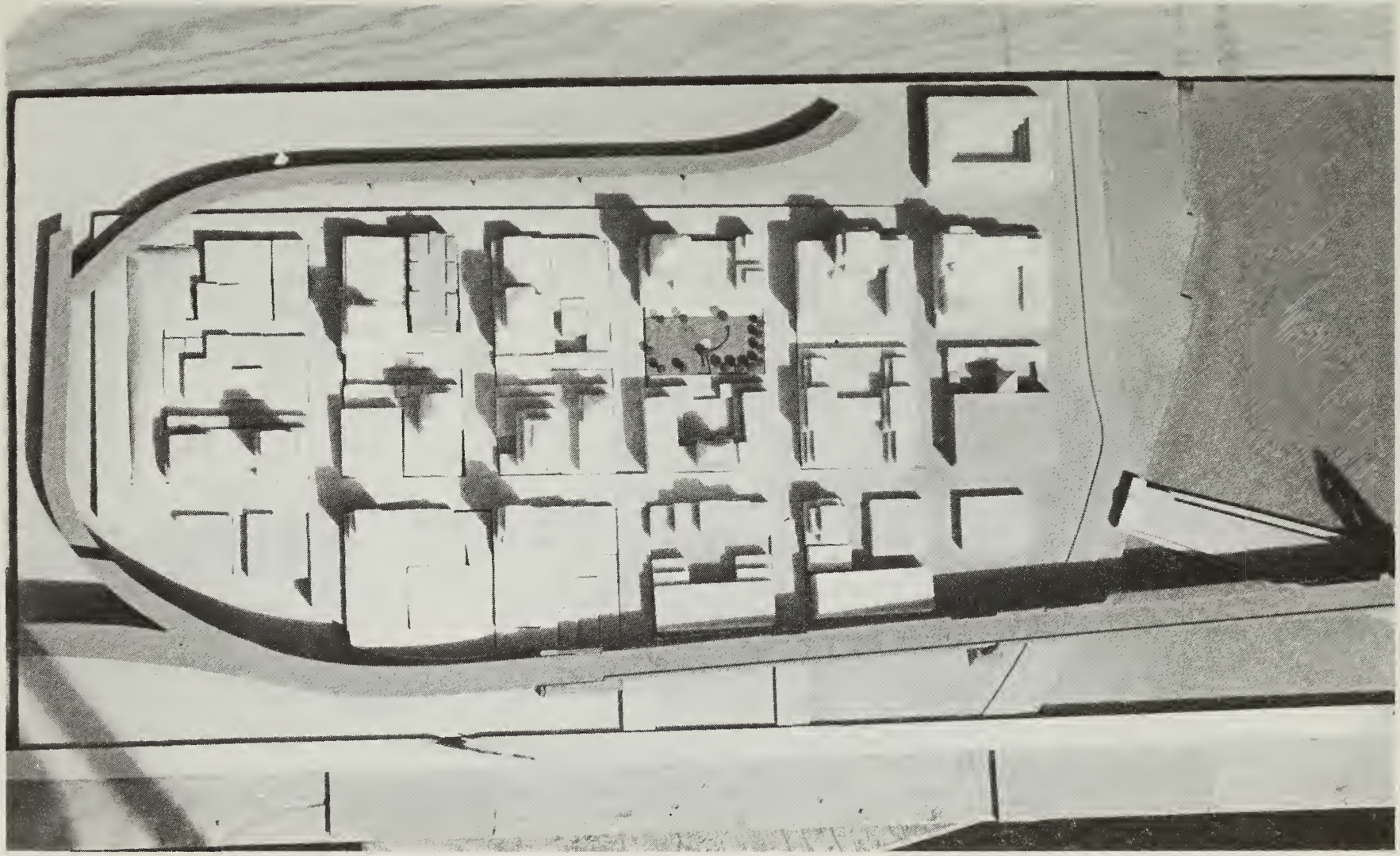


FIGURE CR-42: JUNE 21: 10AM, 200Z FOOT TOWERS

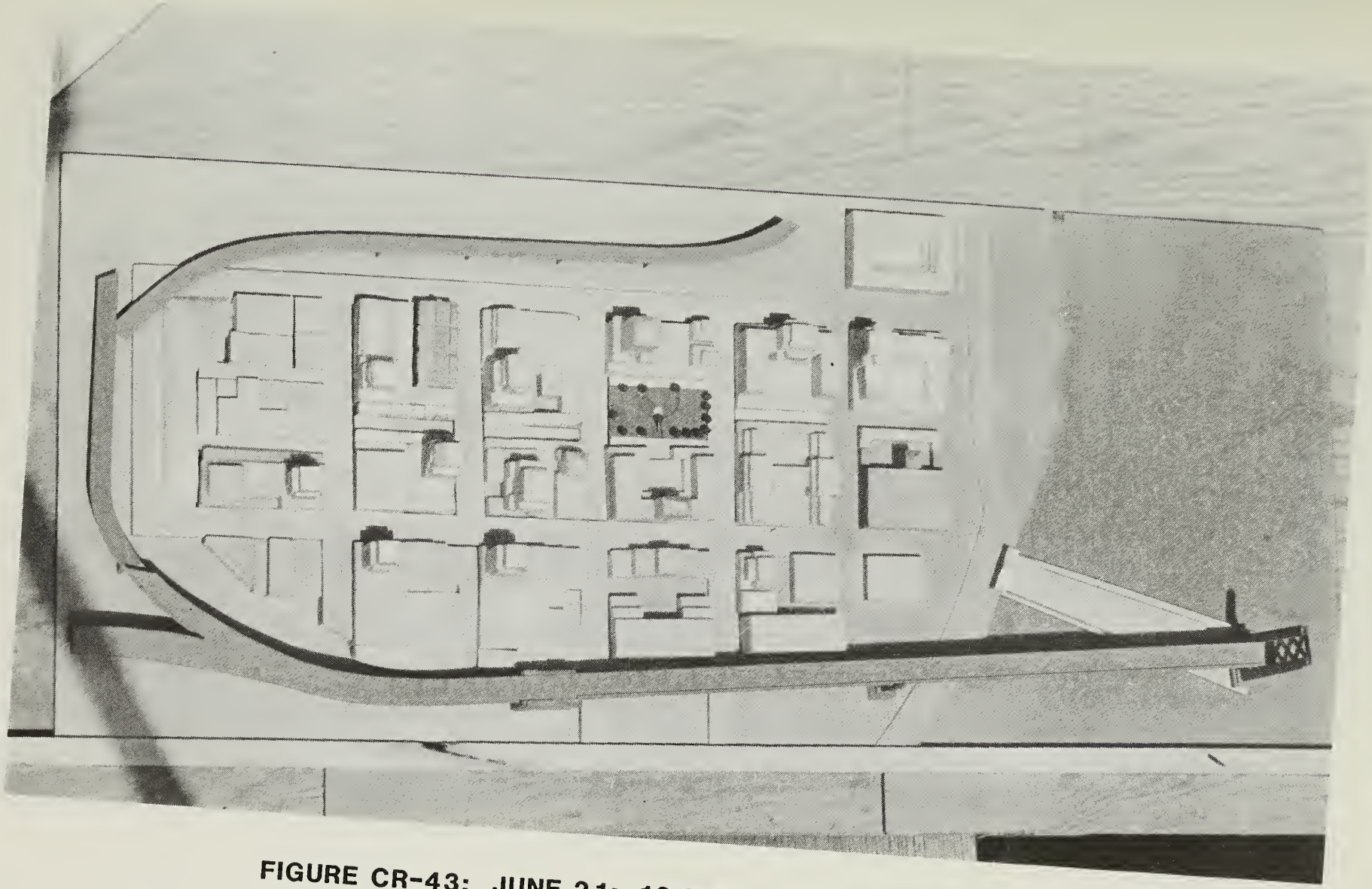


FIGURE CR-43: JUNE 21: 12 NOON, 200 FOOT TOWERS

FIGURE CR-44: JUNE 21: 3PM, 200 FOOT TOWERS

Shadows of the four towers tested in the studies do not reach the Embarcadero or the open space site proposed in the Rincon Point/South Beach Redevelopment Plan. However, structures built according to other height limits proposed in the Plan (ranging from 84 to 200 feet) would cast shadows. The model used in the study includes retention of the Hills Brothers tower building, but assumed a building envelope on the northwestern portion of the site, bounded by Spear, Folsom and Steuart Streets (Block 3744). This design, at its highest point, measured about 170 feet in height and had a number of levels stepping down toward the Bay, and to the southeast, paralleling Spear Street. Since publication of the Rincon Hill Plan Draft EIR, a mixed-use development project on the Hills Brothers site became the subject of a separate Draft EIR (case file # 84.41E), published in December, 1984. The Hills Brothers EIR contains site-specific shadow analyses of the preferred project and its alternatives, and should be referred to for an accurate account of impacts on the Redevelopment Agency park site.

Rooftop open space opportunities identified in the Plan for the southern area of Rincon Hill, alongside the Bridge approach between Fremont and Main Streets (Blocks 3766 and 3767) would not be affected by any Rincon Hill Plan development, since no shadows are cast to the south. The open spaces, however, would be affected by shading from the Bay Bridge itself, in addition to any created by architectural elements in structures proposed for these sites. The model tested, for example, assumes articulated building designs on these sites, which incorporate rooftop open space.

The shadow studies cannot account for any impacts that could affect residential open space incorporated into individual building designs of future private development proposals. As noted in the Draft EIR on p. 85, proposals for all new development in the Plan area would be subject to site-specific environmental and planning review. Shadow analyses, required as a component of such review, would have to reflect impacts with respect to any open space areas, in addition to those in the Plan, that may become subject to sunlight protection requirements.

Wind tunnel studies were also run on the two tower height scenarios of 400 and 200 feet. Figure C-45A shows the wind speed measurement locations, which were centered around highrise Residential Subarea One. The wind speed velocity ratios, and corresponding wind speed values in miles per hour (mph), are listed in Table CR-3. The wind speed velocity ratios represent a direct comparison of the equivalent wind speed at ground level, with the mean wind velocity for the city taken from the measuring station at the top of the Federal Building.

Based on wind and comfort studies prepared for the Downtown Plan, two "comfort" thresholds were identified for ground level wind speeds that would also apply to the Rincon Hill Plan, under the proposed ordinance: a 7 mph threshold would apply to areas providing public seating; and an 11 mph threshold would operate in areas of substantial pedestrian use. The windspeed velocity ratios that correspond with these two standards are .333 and .524, respectively. The proposed ordinance for the Plan does provide for exceptions to these standards with conditional use authorization. Under conditional use review, the Planning Commission would require design review to evaluate how buildings could be altered to minimize wind acceleration impacts. The

conditional use process would also evaluate projects and their wind impacts in situations where existing wind conditions already exceed the 7 and 11 mph thresholds.

A description of wind effects on humans is contained in Table CR-4, which provides a qualitative key to the types of difficulties that are generally experienced with increasing wind speeds.

According to the results for this particular model studied, the 400 foot tower scenario, compared to existing conditions, increased wind acceleration above the 7 mph threshold in three instances, and above the 11 mph threshold in four. In one location, winds exceeding the 7 mph threshold under existing conditions increased above the 11 mph threshold with the 400 foot tower. In another location, the tower reduced wind speeds below the 7 mph threshold; currently, winds at this location exceed the 7 mph threshold. The 200 foot tower reduced winds from those measured for the 400 foot tower in three instances: in one location, winds were decreased below the 7 mph threshold; and winds in the two other locations were reduced below the 11 mph threshold, but still exceeded the 7 mph threshold.

The highest wind speeds generated by the build-out model center around the southwestern portion of Assessor's Block 3748, on the east side of First Street, between Folsom and Harrison Streets. Windspeeds with the 400 foot height district would be approximately 14.9, 16.4 and 17.5 mph at measurement locations 3, 4 and 6, respectively. With the 200 foot height limit, they would be reduced to 11.6, 15.4 and 14.1 mph, respectively.

It is logical that this structure in the model would cause the worst impacts, due to its upwind location; the building facade is the first exposed to the prevailing westerly winds. Being located adjacent to the proposed pedestrian alleyway, new development would likely be subject to the 11 mph standard, unless there were open spaces in the area that provided public seating. Wind acceleration could then be subject to the 7 mph standard.

A structure of this scale, if proposed, would be subject to the conditional use review requirement described above to discern how wind impacts could be minimized and/or determine whether there were overriding benefits from the development proposal that would justify an exception to the standards.

FIGURE CR-45A: VELOCITY MEASUREMENT LOCATIONS AT GROUND LEVEL

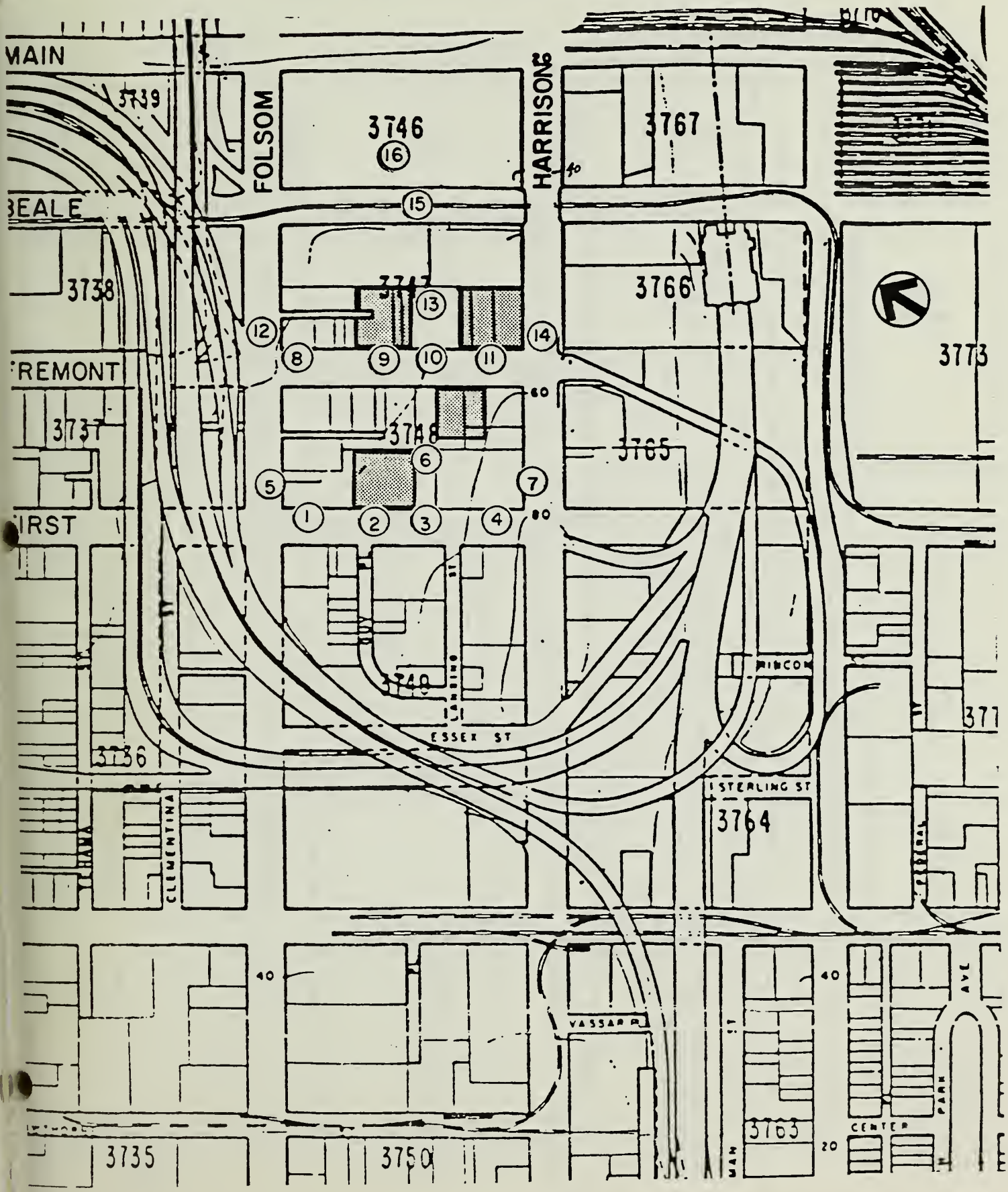


FIGURE CR-45: VELOCITY RATIOS (WEIGHTED AVERAGE) FOR EXISTING BUILDINGS

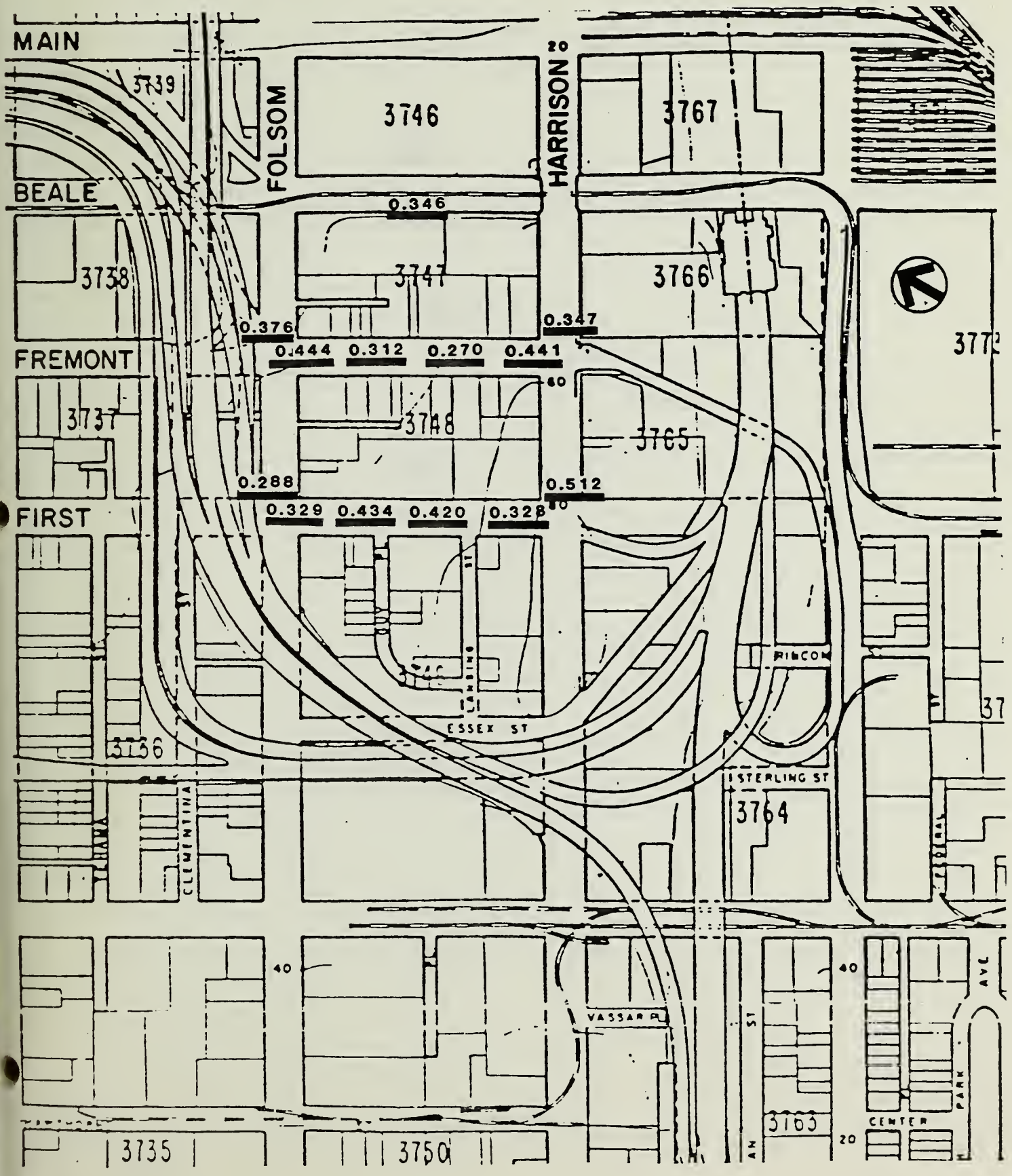


FIGURE CR-46: VELOCITY RATIOS (WEIGHTED AVERAGE) FOR 400 FT. TOWERS

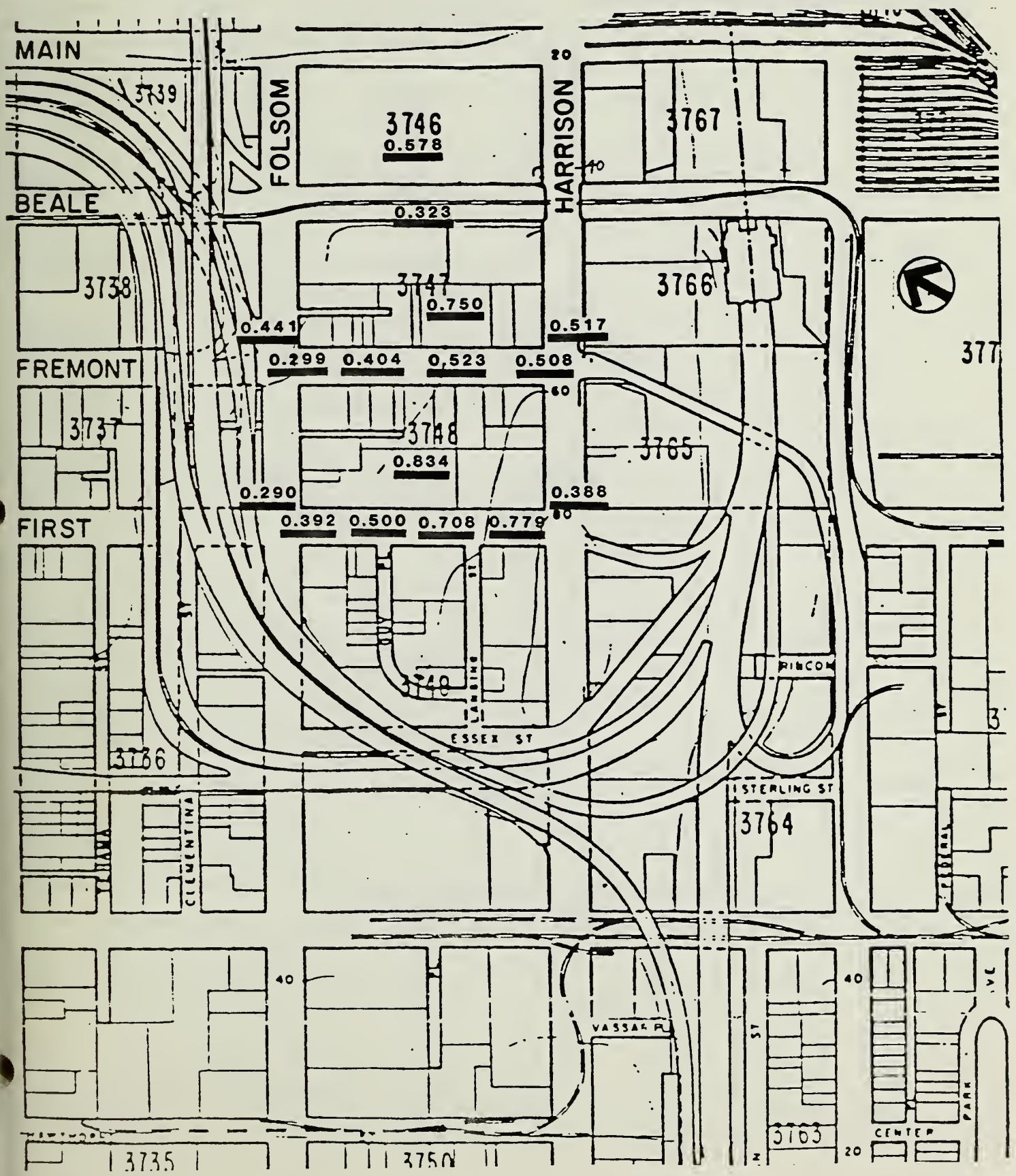


FIGURE CR-47: VELOCITY RATIOS (WEIGHTED AVERAGE) FOR 200 FT. TOWERS

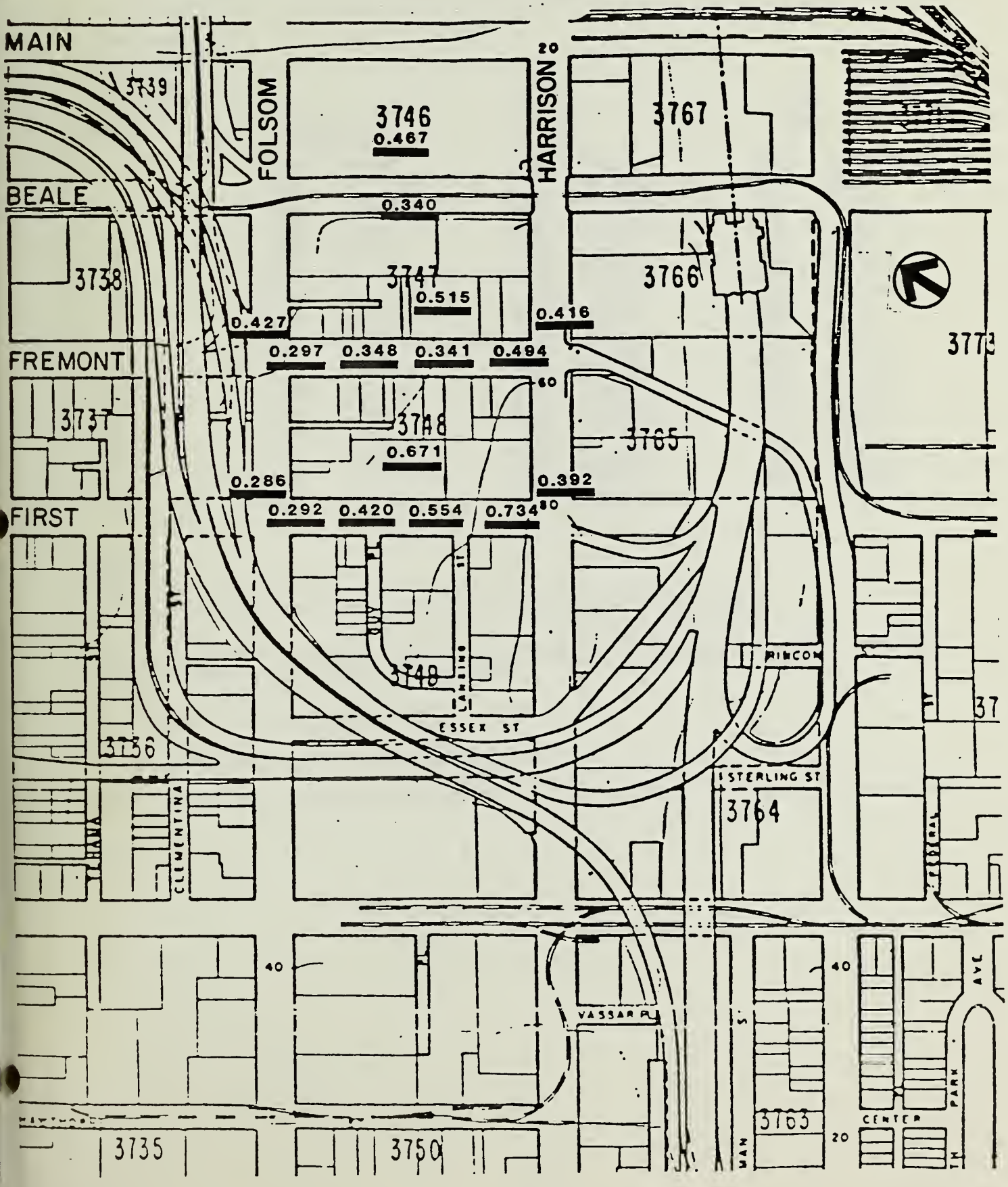


TABLE CR-3 : COMPARATIVE WIND SPEEDS (YEAR ROUND WEIGHTED AVERAGE)

Windspeed Measurement Location At Ground Level)	Existing	400' Tower	200' Tower
1	.329 (6.9)	.392 (8.2)*	.292 (6.1)
2	.434 (9.1)*	.500 (10.5)*	.420 (8.8)*
3	.420 (8.8)*	.708 (14.9)**	.554 (11.6)**
4	.328 (6.9)	.779 (16.4)**	.734 (15.4)**
5	.288 (6.0)	.290 (6.1)	.286 (6.0)
6	N/A	.834 (17.5)**	.671 (14.1)**
7	.512 (10.8)*	.388 (8.1)*	.392 (8.2)*
8	.444 (9.3)*	.299 (6.3)	.297 (6.2)
9	.312 (6.6)	.404 (8.5)*	.348 (7.3)*
10	.270 (5.7)	.523 (11.0)*	.341 (7.2)*
11	.441 (9.3)*	.508 (10.7)*	.494 (10.4)*
12	.376 (7.9)*	.441 (9.3)*	.427 (9.0)*
13	N/A	.750 (15.8)**	.515 (10.8)*
14	.347 (7.3)*	.517 (10.9)*	.416 (8.7)*
15	.346 (7.3)*	.323 (6.8)*	.340 (7.1)*
16	N/A	.578 (12.1)**	.467 (9.8)*

NOTES

Values in parenthesis are wind speeds in miles per hour (mph).

N/A: There are currently structures at these measurement locations, and thus no applicable ground level wind speeds.

* Exceeds 7 mph threshold only.

* Exceeds both 7 and 11 mph thresholds.

Table CR-4: WIND EFFECTS

Wind Speed*	Effects Observed or Deduced
0	Calm, no noticeable wind
	Wind felt on face
4.4	Clothing flaps
8.8	Newspaper reading becomes difficult
13.2	Hair disarranged, dust and paper raised, rain and sleet driven
17.6	Control of walking begins to be impaired
	Violent flapping of clothes, progrss into wind slightly slowed
22.0	Umbrella used with difficulty
26.4	Blown sideways, inconvenience felt walking into wind, hair blown straight
	Difficult to walk steadily, appreciably slowed into wind
	Noise on ears unpleasant
30.8	Generally impedes progress
	Almost halted into wind, uncontrolled tottering downwind
35.2	Difficulty with balance in gusts
	Unbalanced, grabbing at supports
41.8	People blown over in gusts
48.4	Cannot stand

*Standard equivalent mean wind speed, in miles per hour.

Source: Edward Arens, Designing for an Acceptable Wind Environment, 1981.

Commissioner Rosenblatt

"Page 35 - How high absolutely and relative to proposed and existing height limits are the elevated freeway and bridge ramps?"

RESPONSE

Figure CR-48 identifies heights of the freeway and Bay Bridge roadbeds at different points surrounding the Rincon Hill area measured from grade. These may be compared directly with height limits proposed in the Plan. As noted, the Bay Bridge and freeway approach range in height from approximately 140 to 180 feet above grade; the Embarcadero Freeway to the north and west of the Plan area range from about 70 to 130 feet in height above grade.

Under the existing height limit of 105 feet for the entire Rincon Hill area, the height differential between grade and freeway in most portions of the periphery is less than that which would occur with the 84 foot limit proposed in the Plan. The one area of exception would be the portion of Folsom Street, between First and Spear Streets, where maximum heights would be 200 feet.

COMMENT

John Elberling, SFRG

"[Cumulative Impact Evaluation for] Urban Design. Ah yes, the new skyline given the combined Rincon Hill skyscrapers and the Downtown Plan bulge into the South of Market. It appears to have been done - print it."

RESPONSE

The cumulative skyline study referred to by the commentor was in the process of being prepared for the Downtown Plan Final EIR (EE81.3, certified: October 18, 1984) at the time of the DEIR public hearing for this EIR. It is included as Figure IV.H.19, on p. C&R-H.18 of the Downtown Plan EIR Responses, Volume Three (Part I), and is hereby incorporated by reference. As indicated on the figure, the skyline study contains full build-out of Rincon Hill along with the Downtown skyline as projected at the year 2000. The scheme of development on Rincon Hill is taken from the conceptual model prepared by Daniel Solomon and Associates, which is the same one used in the additional wind, view and shadows studies contained in this comments and responses document on pp. 19-30.

As noted in the description accompanying Figure IV.H.19, the amount of development in Rincon Hill in 2000 would not be as extensive as that depicted in the photograph. Whether or not Rincon Hill would ever develop to full build-out is itself a question that is speculative in nature and is the main reason there is no definitive scenario provided depicting Rincon Hill development in 2000.

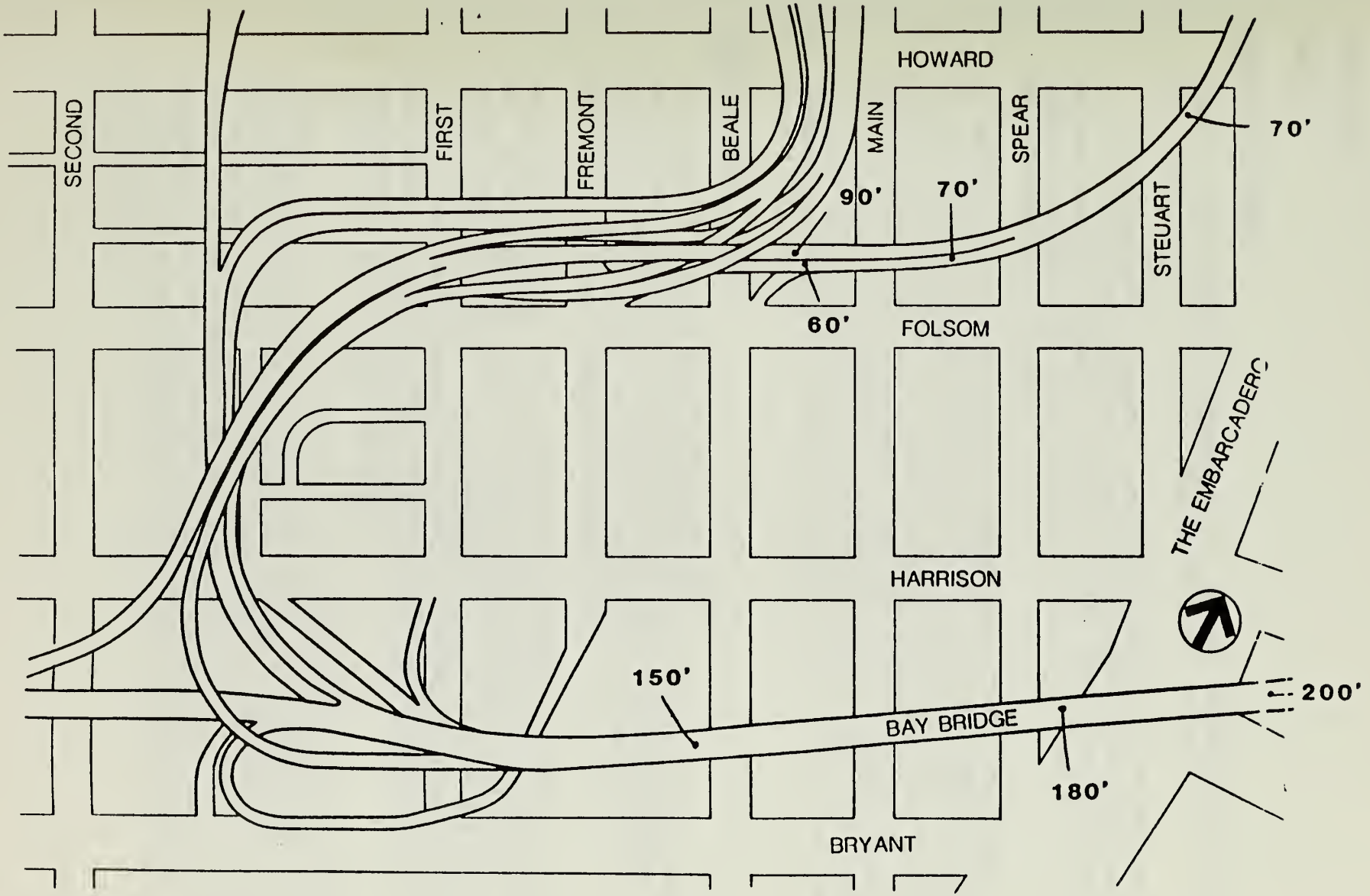


FIGURE CR-48: FREEWAY HEIGHTS

OPEN SPACE

COMMENT

Commission Bierman

"Page 8, under Sponsor's Objectives, one is that the Plan will provide open space. I just think that that probably is not realistic.

....An overpass over a street is called open space. We're dealing with, in this plan, 37 to 6,800 units, and it would seem to me that in any kind of good planning, we need a real park, a real plaza, something besides trees on streets. And I love trees on streets, but I think we have neglected that in this plan.

It reminded me of how Chinatown got developed with so little open space. We are putting a density down here that will call for something real, and I didn't see evidence of it. We have recently given up that full square block park that was to be between First and Second at Folsom in the Downtown Plan. That is no longer a possibility. So I think we really seriously need to talk about it in the EIR. If I am correct in my analysis, then that should be stated very clearly. And I would hope between now and when the comments come back, there will be more thought given to open space."

John Elberling, SFRG

"The project has both publically-owned and private-but-publically-accessible open spaces. The publically owned space appears to be limited to garage roof tops north of the Bay Bridge. One cannot tell from either the Plan or DEIR what is proposed for Block 3766 - the stippling is not explained in the legend.

No one can really tell how useful public open space at these locations may be. While admitting some Bay Bridge shadow impact, there are no shadow impact diagrams. Moreover, the condo highrise towers to the west should have some real impacts. Acknowledging exact siting for the four project towers is not determined, any reasonable estimate, such as depicted in the many model photographs, could be used to estimate project impacts. Avoidance of shadow impacts on these open spaces is nowhere given as a criteria for later project approvals.

Moreover, there is no discussion in the Urban Design section of just what vistas will be available from the designated public open spaces. Is the Bridge in the way? This frustrates any effort to determine if there may be an optimal location for public open space with the widest available vistas (the top of the hill on the Union Oil site?). There is not even a topographic map of the area which would obviously assist such a discussion. Optimal open space locations other than those proposed should be identified as a Sub-Alternative. Basically a very sloppy job of open space planning."

Commissioner Bierman

"Page 12, it talks about open space around the Bay Bridge anchorage. Then later in the EIR there is a picture of just parking around that anchorage, and it's not clear to me what the plan proposes, whether to do away with the parking and put a park or -- that is very confusing, and I'd like it clarified. Maybe there is something that needs to be photographed that is different than the document contains as to what is there.

I was troubled by the page that deals with open space in a chart. It would seem from that chart that there is no ground level open space planned. From the chart, it seems that there is nothing but using streets, sidewalks, rooftops, as open space. There are no ground level plazas. Are there no yards? Are there no playgrounds? Are there no children to be expected to live in this area? Who is building the garages? And if these are not built, where will the open space be? It's brushed over seriously. On the open space page, it's called "recreational use," presumably which would include tennis and other sports. They're all beside the Bay Bridge at 84 feet in the air, where pollution and noise are going to be really bad. We need a more careful analysis of those rooftops."

RESPONSE

Figure CR-49 is provided to clarify the sites identified as open space opportunities in the Plan and would replace Figure 5, p. 12 in the Draft EIR. Since the City currently has no control of property contained in the Plan area, and none is anticipated in the foreseeable future, there are no formally designated open spaces that would be maintained by the City. The Plan thus suggests opportunity areas that can provide publicly accessible open space use in conjunction with development that could occur on-site. For example, the sidewalk widening and improvements along Beale, Main and Spear Streets, is encouraged with residential development on Assessor's Blocks 3744 through 3748, between Folsom and Harrison Streets.

The most notable aspect of open space potential in the Rincon Hill Plan is an open space requirement for 20% of site area of each development project which is included in the proposed ordinance. This requirement would apply to commercial/industrial development sites for the purposes of providing publicly accessible open space. Such a 20% requirement for commercial development is unprecedented in San Francisco.

The 20% open space requirement would also apply to residential development parcels to provide for publicly accessible space. This requirement could be satisfied by developing portions of the pedestrian alleyway system, which is the only opportunity area required under the Plan, or other ground floor open space amenities. In addition, the ordinance for the Plan would require residential open space at a proportion of one square foot for every 13 square feet of floor area in residential use. Up to 40% could be provided for private use (e.g. balconies or solariums), and at least 60% provided as common usable space which may be added to the 20% site requirement.

Given the open space provisions in the ordinance, requirements could be

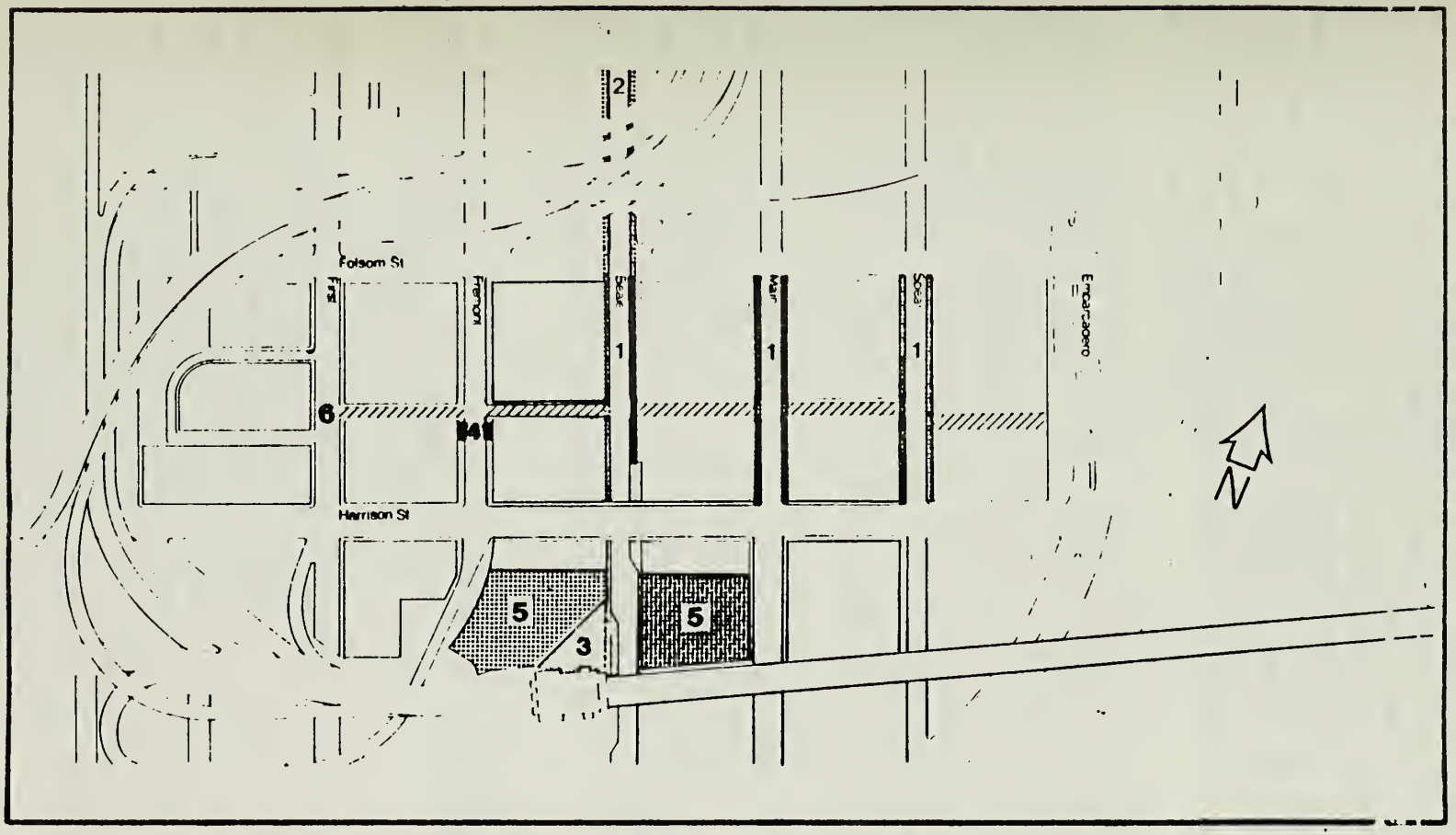


FIGURE CR-49: PUBLICLY ACCESSIBLE OPEN SPACE OPPORTUNITIES

LEGEND:

1. SIDEWALK WIDENING, STREET BEAUTIFICATION
2. SIDEWALK WIDENING, STREET BEAUTIFICATION, TO CREATE PEDESTRIAN CORRIDOR TO FINANCIAL DISTRICT.
3. PRESERVE OPEN SPACE AROUND BAY BRIDGE ANCHORAGE
4. CREATION OF WIDE PEDESTRIAN OVERPASS
5. RECREATION FACILITIES ON ROOFTOPS OF POTENTIAL INTERCEPT PARKING STRUCTURES
6. CREATION OF A PEDESTRIAN STREET NETWORK

satisfied in many different ways, ranging from open spaces similar to those identified in the Plan, to a series of unrelated ground floor open spaces scattered among development throughout the Plan area. Except for the pedestrian alleyway system which is mandated in the Plan, the other open space opportunities itemized in the Plan would not necessarily be realized if developers chose to satisfy their requirements with different open space amenities (upon approval by the Planning Commission). Under the proposed ordinance, all open space (except perhaps residential open spaces) would be publicly accessible and would be subject to public review as a component of each development proposal under conditional use review. The open space policies of the Plan offer great flexibility in providing open spaces for a variety of recreational uses.

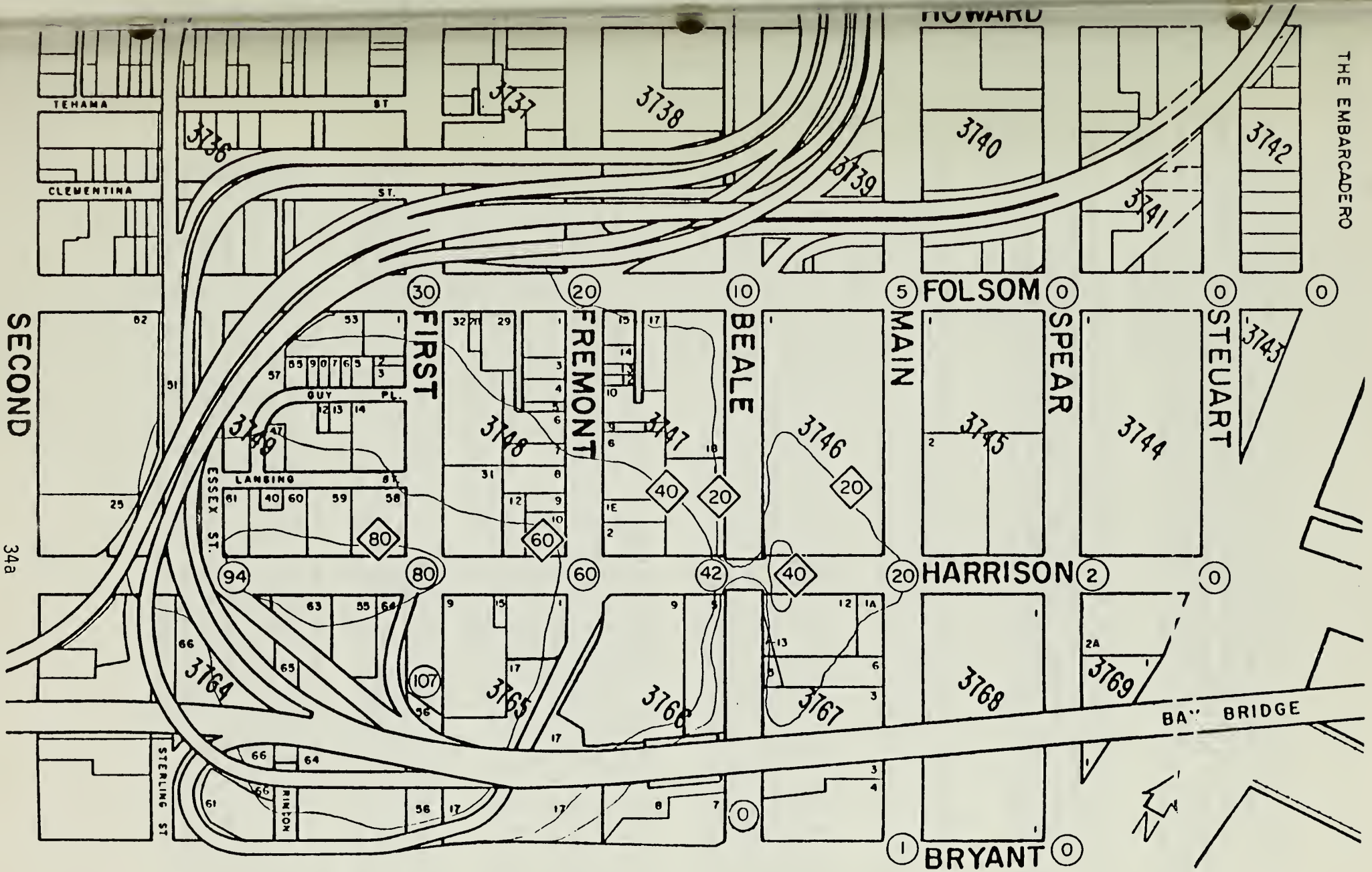
The Plan identifies rooftop open space opportunities over two buildings that could be constructed adjacent to the Bay Bridge between Main and Fremont Streets (Assessor's Blocks 3766 and 3767). The Plan suggests that such structures would be appropriate for use as peripheral parking resources, although they could also contain industrial/commercial development under the zoning proposed. Figure CR-50 provides street and topographic elevations to help identify view opportunities. With the proposed height limit of 84 feet, open space atop structures on these sites could have scenic views of the Bay to the northeast. Views to the west, south and southeast would likely be blocked by the Bay Bridge and higher elevations of Rincon Hill.

The Bay Bridge anchorage site, located at the eastern corner of Block 3766 (see Figure CR-49) is also identified as an open space opportunity. If it was improved for open space use at its current elevation, views of the Bay would be available primarily to the east, under the Bridge. Views to the northeast towards the Embarcadero and to the west would be limited or completely obstructed due to potential development on blocks between the anchorage site and the Embarcadero or higher up Rincon Hill. This site is shaded by the Bay Bridge anchorage itself throughout the winter and in the mornings during the fall and spring.

The pedestrian alleyway system, if aligned, would provide a mid-block view corridor from First Street to the Embarcadero. However, portions of this walk would be shadowed by development fronting on the alleyway. Shading would tend to be the most adverse during the winter months.

View opportunities of a pedestrian bridge over Fremont Street would depend on its height relative to surrounding development. Given that the highest heights would be permitted in this area, it is likely that views toward the Embarcadero and promenade would be limited or completely blocked. Views towards the Downtown district would continue to be interrupted by the elevated freeway. Should the I-280 Transfer Concept Program under review include removal of the Embarcadero Freeway, views may be improved, although there would still be some remaining ramps that could obstruct views, under the alternatives analyzed in the Final EIR completed for the program (case file # 84.385 E, certified May 23, 1985). Depending on the siting of future development proposals, the bridge would most likely be shaded in the winter months and portions of the afternoon, year-round.

Noise and air quality impact information for the Plan, described on pp. 55-63 of this document, is applicable to the open space opportunity sites.



34a

FIGURE CR-50: STREET ELEVATIONS

○ = STREET ELEVATION, MEASURED IN SAN FRANCISCO DATUM (AFTER GRADING).

◇ = TOPOGRAPHIC ELEVATION, MEASURED IN SAN FRANCISCO DATUM.

Open space provisions of the Plan and its implementing ordinance would augment open space amenities incorporated into the Rincon Point/South Beach Redevelopment Plan adopted by the San Francisco Redevelopment Agency. The major open space in that Plan is a proposed park between the Embarcadero and the waterfront promenade that would provide a nearby amenity to residents and workers in Rincon Hill development as well as those of future Rincon Point/ South Beach development.

These factors combine to provide potential for new open space in an area that currently has none, and which for the most part has no requirements for such in the City Planning Code. Further discussion of whether the proposed open space requirements would provide the type of open space that is acceptable to the City is a matter of public policy and is appropriate to consider in public hearings on the Plan.

In light of the above discussed, portions of the Draft EIR have been corrected to accurately reflect the open space policies of the Plan.

A new second paragraph is added and remaining paragraphs on p. 84 of the Draft EIR would be amended to read:

> "The Plan includes opportunities for publicly accessible open space, which could be provided by developers to satisfy an open space requirement of 20% of site area. The 20% requirement would apply to both residential- and commercial/industrial-zoned parcels. Provision of these open space amenities (shown in Figure 5, p. 12) are not mandated under the Plan, since the City does not have property control to formally designate or maintain these areas.
>
> Under the Plan, an east-west alley system through the middle of Blocks 3744 to 3748, between Folsom and Harrison Streets is encouraged as a component of new residential development. This is the only open space opportunity that is mandated by the Plan; the others are recommended. Low-rise housing and retail activity would likely line the alleys and conceal parking garages of highrises and midrises from public view. The alleys could be constructed at ground level with the possible exception of the creation of a pedestrian bridge over Fremont Street, linking the residential uses on either side of the street.
>
> In addition to the development of an alleyway, street narrowing of Beale, Main and Spear Streets would be encouraged. The public sidewalk could be widened and privately developed with lighting, decorative paving, seating and landscaping in order to provide pedestrian corridors to the downtown.
>
> Two sites on which intercept parking garages are recommended are on portions of the two blocks bounded by Fremont, Harrison, Main, and the Bay Bridge in an 84-foot height district. The tops of the garage roofs are recommended for recreational use that would prevent midrise residential development from overlooking open parking garages. The garages themselves would have to be enclosed in order to conceal parked cars from the bottom floors of adjacent midrises fronting Harrison Street. An illustrative perspective of development sites in the project area is provided in Figure 32, pp. 88-89.

Open space amenities except the alleyway system may not be developed as outlined in the Plan. The implementing ordinance for the proposed Plan would allow satisfaction of open space requirements that could result in unrelated, publicly accessible open spaces, developed on an incremental basis as development projects are built in the area."

COMMENT

Commissioner Bierman

"Page 81 and 82, we need to list policies re usable open space plazas, yards, et cetera, and how this plan relates to it. I just think we have some negatives that could go in here and then should be mitigated."

RESPONSE

The Master Plan does not contain any policies that provide insight into how much open space should be provided in relation to residential development. However, several policies direct open space to serve a variety of recreational uses. Citywide System Policy 2 ("Acquire additional citywide open space for public use"), and Neighborhood Policy 2 ("Acquire new park and recreation space to serve San Francisco's residential neighborhoods"), both in the Recreation and Open Space Element, support the continued acquisition of new open space, particularly in recognized high need residential areas and areas with unique natural characteristics. The Rincon Hill Plan does not propose any sites for open space acquisition, relying on the open space requirements discussed above. Though Rincon Hill has not been designated a high need area for open space amenities, it could become one in the future, if the open space requirements were not incorporated as part of the implementing ordinance for the Plan. Inclusion of the open space requirement (for both residential and commercial development), however, would tend to support Citywide System Policy 4 ("Require usable outdoor open space in new residential development") and the Urban Design Element Neighborhood Environment Policy 10 ("Encourage or require provision of recreation space in private development").

Other objectives and policies in the Recreation/Open Space and Urban Design elements encourage maximizing recreational opportunities and public access to them (Urban Design Neighborhood Environment Policies 8, 9 and 10). In this respect, open space policies of the Rincon Hill Plan encourage that open space be provided at ground floor or above, providing lighting, seating, landscaping and decorative paving, which would be publicly accessible. The Plan does not prescribe any further detail on the use of these open spaces.

Rin Ten Ten

"The Illustrative Plan (Figure 32 of the EIR Draft) shows a public open space in the city block bordered by Beale, Main, Folsom and Harrison. Other than the original graphics from the University of California Plan, the park has inexplicably vanished from the text of the EIR. Why and where has it gone? What ground-level public open space has replaced it?"

RESPONSE

The Plan contains no provisions for public-owned open space. The plaza depicted in the model of Rincon Hill build-out on pp. 88-89 of the EIR represents the concept of the Rincon Hill Plan proposed by Daniel Solomon and Associates, which did include the open space on Block 3746. For a comparison between the Solomon Plan and the Departmet's proposal, please refer to pp. 2-3 of this document. This illustrative figure should not be assumed to be the master development scheme. Larger-scale open space, similar to that in the figure, perhaps could be created if commercial developers satisfied their open space requirements collectively, or if sites could be acquired for open space by the Recreation and Park Department. Given the limitations on funding and higher priorities in other neighborhoods, such acquisition is not considered to be realistic in the foreseeable future.

POPULATION, EMPLOYMENT AND HOUSING

COMMENT

Ron Mulcare

> "There is no discussion in the EIR about loss of jobs that currently exist in the area."

Commissioner Bierman

> "Then we have to think about the job displacement, too. ....Page 25 through 34, is there evidence that by the plan we are placing more stress on printers and other small businesses or less stress? Does the plan slow their exodus or hasten it? There is not much about that. Would lower heights help to slow their exodus? Is there some way that we can get information that helps us judge how we develop this, that will help the [printing] industry stay and have housing? Since there is so little likelihood of having affordable housing in this area, it looks to me like there is very little likelihood."

RESPONSE

As stated on p.95 of the EIR, the estimated employee population under full build-out conditions of the Plan would be 15,100, assuming standard employment density ratios. The ratio factors are general, corresponding with the flexibility in commercial development afforded by the Plan, and make a distinction only between office workers and commercial/industrial workers. This latter category includes an array of activities that may range from neighborhood serving retail to light industrial or manufacturing functions.

Should full build-out of the Rincon Hill Plan be realized, all 1700 existing positions could potentially be displaced. This is the implication made in the last sentence of paragraph two, p.95 of the EIR, where it states there would be a net increase of 13,400 employees in the area. To clarify this statement, the following revision has been made to the paragraph:

"...approximately 15,100 potential new employees could be generated by full build-out. This could potentially displace approximately 1,700 employees currently working in the area, thus representing a net increase of about 13,400 employees."

It should be noted that the Plan would permit most of the commercial and industrial activities that currently exist in Rincon Hill, particularly that area proposed in Subarea Three which contains the greatest employment potential. It is possible that a portion of the current employment population could be employed within new commercial/industrial development under the proposed Plan.

The discussion starting on p.25 of the EIR regarding employment shifts is intended to provide an overview of changes in the industrial and manufacturing sectors on a national level. It is against this backdrop that the changes described in the South of Market can be better understood.

Within the Rincon Hill area, there are six printing establishments. Four of them are located on one site on Fremont Street, which is contained in the area proposed for high-rise residential use (Subarea One). The other two sites are contained in Subarea Three, proposed for Commercial/Industrial use.

Without making assumptions about when and where high and mid-rise housing construction will occur, or of the pressures influencing future land values and market forces, the proposed Rincon Hill Plan could most obviously affect the four printers on Fremont Street; the heights proposed in Subarea One are the most permissive for high density residential development. The Plan itself does not prohibit the continued operation of these businesses. Under the Rincon Hill zoning they would become non-conforming uses that could remain on their sites indefinitely, presumably until it is no longer feasible.

The Plan's effects on printers in Subarea Three are less clearcut, since the proposed zoning is essentially the same as the M-1 (Light Industrial) classification currently in effect, with exception of a height reduction from the current limit of 105 feet to 84 feet. This could provide a more stable area for continued operation of existing printing services. However, housing development in Subareas One and Two would likely affect the mix of non-residential uses in Subarea Three. In general, industrial and manufacturing functions, which include printing, cannot compete for space in the same market with retail or office uses.

In the context of this discussion, it is necessary to point out that it is not possible to determine precisely if the Plan would indeed hasten the "exodus" of the industrial sector. As discussed on p.25 of the EIR, industry has been moving out of the South of Market for several years under existing zoning controls. What has been occurring in the printing industry is reflective of other industries. Large printing companies, employing the majority of workers, have been moving out of the city seeking large facilities that can accommodate single-floor operations. Many have relocated in South San Francisco, as well as in the East Bay. Printing services in San Francisco have increasingly been provided by smaller, often specialized companies that can operate within the city's existing warehouse stock. However, given the number of jobs in larger firms that have migrated out of the city, there is a net decline in printing jobs in San Francisco.

Rincon Hill itself is surrounded by increased pressure for office and commercial development: Downtown and Yerba Buena Center to the north and west, and the Second Street corridor containing numerous office conversions immediately to the southwest. This is one of the compelling reasons for proposing the residential zoning of Rincon Hill Plan, since there is little possibility that housing development could compete with the pressure for office/commercial space in the Rincon Hill area.

Lowering height limits in the residential subareas could reduce land value pressures on industry, but it could also make residential development less attractive, which would be counterproductive to the purposes of the Plan.

COMMENT

John Bardis

> "In your EIR, you mentioned that you might have a workforce which is grossly understated. Let's take your own figures. For two million square feet of floor area of commercial space, you only have 13,000 or 14,000 employees added. And then you go through a kind of shell game, which drops this down to some lower figure. When you add 13,000 employees to this workforce, that is 13,000 persons in demand for housing. Where is the housing for that? You say that 3,000 or 4,000 units of housing will take care of that 13,000 workforce? If that 13,000 workforce was housed in San Francisco, you'd have to have at least 11,000 units of housing. If it was housed in San Francisco -- and, Mr. Klein, should you take special note of this -- if it was housed in San Francisco, it would create jobs. By creating jobs, by the needs that those consumer units have, as a result of that we'd need another 13,000 people employed to support those people. We would need 26,000 units of housing. I urge you to reconsider what you have as an EIR as being deficient. And eventually we will talk about the plan."

RESPONSE

The employment density ratios used to estimate the work force under maximum build-out conditions in Rincon Hill are based on employer surveys conducted for analysis of the Downtown Plan. It is the most up-to-date information that is available for San Francisco. Because the Plan proposes a substantial change in land use policy for the area, there is no similar data available that specifically reflects present employment conditions for the Rincon Hill area. The EIR acknowledges the generality of using these ratios. However, it is believed there are enough assumptions incorporated to present a conservative scenario: 1) The analysis assumes full build-out to the limits of the zoning for the entire Plan area; 2) The ratio employed for Subarea Three (350 sq.ft/employee) is substantially more dense than that which occurs in light industrial activity (780 sq.ft/employee), which would be permitted in the subarea (office employment ratios, however, range from 310 to 275 square feet per employee; retail ratios estimate 350 square feet per employee); and 3) Subareas One and Two are calculated based on a denser office employment ratio, although it is expected that substantial portions of this space would be devoted to less dense retail use.

Residency patterns and employment density incorporated in the Office Housing Production Program (OHPP) formula, which was used to estimate housing need in the EIR, are closely borne out by the downtown employment survey information. However, the OHPP formula is only accurate for estimating housing need that is generated by current C-3 employment growth. Moreover, it cannot be determined if future employment patterns in Rincon Hill would resemble the present pattern of downtown office workers which could enable the reliance on this information. Based on analysis prepared by Recht Hausrath and Associates, it is estimated that the proportion of San Francisco residents from future downtown growth will actually decrease over the next 15 years, to levels below the 40% assumed in the OHPP formula used in the Draft EIR.

Since publication of the Draft EIR, an OHPP ordinance was adopted by the Planning Commission on May 14, 1985, which operates under a different formula than that used to calculate the housing requirement in the Draft EIR. The ordinance is currently before the Board of Supervisors and may possibly be amended before any version becomes effective.

The Commission-adopted version applies to all office space proposals citywide, containing at least 50,000 net new square feet of office floor area. Under the formula in the ordinance, 62% of the calculated unit requirement would be provided to low and moderate income households for 20 years. Because of this new requirement for affordable housing, the OHPP formula is changed from that applied in the Draft EIR to adjust for high production costs for affordable housing. Applying the new formula to the five million square feet of potential floor area, the OHPP requirement would be 1930 dwelling units, almost 1200 of which would be available at low or moderate prices.

Based on the above discussion, the third paragraph on p. 95 of the Draft EIR has been revised, and the fourth paragraph deleted. The new text would read:

> "At the time of certification, an ordinance for the Office Housing Production Program (OHPP) was adopted by the City Planning Commission and is currently under review by the Board of Supervisors. This ordinance requires that office developers provide affordable housing to address the effects of addtional office employment on the City's housing resources. If all employment projected under the Plan were office workers, the total amount of housing required under the OHPP formula would be about 1930 dwelling units. Approximately 1200 of these units would have to be made available to low and moderate income households for a period of 20 years."

COMMENT

Richard Anderson

> "Please consider this letter as a brief addendum to our DEIR comments dated 25 July, 1984. Page 53 of the DEIR states that "[a]ll of the units [on Guy Place] are rental." Page 156, however, indicates that 16 Guy Place is not a rental unit but is instead owned by its occupants. Although this is a minor point, it could have some bearing on the housing policies being considered for Guy Place."

RESPONSE

The statements referred to on p. 53 of the Draft EIR pertain to a housing survey conducted on residents on Guy Place. As stated in the EIR, 14 of the 16 surveys were returned, all of which were from renters. A survey was not received from the party at 16 Guy Place; apparently, this is an owner-occupied unit.

TRANSPORTATION

COMMENT

Ruth Allen

"[W]e know that our bridges and roads and streets are not only at their capacity, they're over their capacity. And the impact of this new building certainly will be devastating.

So, I am suggesting that you work with them and either not consider this density type of housing or, either that, the taxpayers are going to have to stand the expense of renovating or improving our bridges and highways, and that is kind of not fair."

Commissioner Bierman

"[I]t's appalling about the cumulative impacts in this area, not just the Rincon Hill Plan, but the development plan in the Downtown Plan. It says in this EIR: There will be delays of five to ten minutes on Harrison at F conditions jammed; F condition on First and Second going from instead of two hours, that condition, to a three-hour period. Mind you, existing level of service now is F on those streets. And we are extending it at least an hour. Other streets, we are changing from Level B to C and D, and we are changing some from D to E."

Richard Anderson

"The DEIR is optimistic with regard to projected traffic impacts. Specifically, the DEIR states that by the year of 2000:

> It would be extremely difficult for Plan area traffic to use Harrison Street during P.M. peak conditions without significant delays of 5 to 10 minutes.

This statement downplays the severity of existing and projected traffic conditions on Harrison, First, and Folsom Streets. Each of these streets often experiences level of service "F" during the evening peak period, with delays of up to one-half hour on Harrison between Fremont and First, and on First between Folsom ad Harrison. These delays will only worsen as a result of the policies contained within the Downtown and Rincon Hill Plans, and should not be trivialized by assertions of delays of only '5 to 10 minutes.'"

Commissioner Bierman

"Page 4, regarding transportation impacts. Again, I think we need a designation that is different than just F. F is then called "jammed," and sometimes it's described by two three-hour periods. But I think we need to just start calling it what it is. When it reaches a level that is the difference between E and D and between E and F, then F, when the problem reaches something else, you do double F or you call it G, but I imagine you should just start doing a string of F, double F, till we really get an idea of what we are doing, particularly in this crucial area."

RESPONSE

Level of Service (LOS) ratings are based on volumes of traffic or ridership (transit) to system capacity. The system capacity is an absolute figure. LOS "F" represents the situation when full capacity is utilized or "jammed," a point at which an intersection or transit vehicle cannot accommodate any more vehicles or riders at that point in time. The assignment of additional LOS ratings such as "FF" or "G" as one commentor suggests, could not be described in any terms distinguishable from LOS F. Taken to its logical conclusion, the addition of LOS ratings would imply that there is either a means of actually increasing capacity, or that it is possible to get fuller than full.

The LOS F condition does not allow an intersection or transit vehicle to accommodate more vehicles or passengers; instead, the average time duration over which the jammed conditions are experienced increases in order to accommodate the extra vehicles or passengers. The analysis in the DEIR includes extra efforts towards providing information that describes actual conditions in the area by supplementing the LOS rating for transit ridership with narrative descriptions of passenger crowding, which was first introduced in the Downtown Plan FEIR (EE81.3, Certified October 18, 1984). This information is included in Appendix Table B-4, p. B-5 of the Rincon Hill Draft EIR. LOS ratings for intersections are also supplemented with a notation of the average duration of peak periods (in one hour increments), which is contained in Table 12 on p. 108 of the EIR. In addition, Appendix Table B-3, p. B-4 of the EIR transportation appendix, which is referenced in Table 12, contains interpretive comparisons of other intersections to further illustrate operational levels of service.

Appendix Table B-3 also provides estimates of average vehicle delay, which represents the average amount of extra time necessary, above optimal conditions, to proceed through an intersection for each LOS rating. Since the constraint creating delays in the Rincon Hill area is not intersection operation but freeway capacity at the Bay Bridge access points, delays are not isolated to the physical intersections, but are experienced on the streets approaching those access points. Such is the circumstance on Harrison Street. As noted, drivers will experience an average delay of five to ten minutes approaching and proceeding through the intersection at First Street. This delay is roughly equivalent to five to ten signal cycles. As this is an average, there will be episodes when delays may be longer or shorter. At an average worst case, these conditions may be experienced by drivers over a three-hour period during the evening commute, and consist primarily of traffic from cumulative downtown development as well as full build-out of the Rincon Hill Plan.

COMMENT

Commissioner Bierman

> "As to the Muni, level of service to the northwest corridor goes from D to E. And there is a line that says: Even with program service improvements, cumulative development would result in low levels for passenger comfort on BART and Muni as currently experienced. That is, as far as I understand, with all the improvements that we are planning, everyone will be less than comfortable."

RESPONSE

Transit analysis in the EIR assumed the same increases in capacity as in the Downtown Plan FEIR (EE81.3, Certified: October 18, 1984). As noted on p. 110 of the Rincon Hill EIR, projected capacity increases through 1990 were based on the five-year plans for each of the transit agencies: Muni, BART, AC Transit, Golden Gate Transit & Ferry, Sam Trans, Southern Pacific-Caltrain. Capacity increases between 1990 and 2000 were determined based on information supplied by the individual transit agencies. The EIR thus includes in its analysis certain improvements to be in service by the year 2000, as acknowleged through these sources.

It is important to be aware that, as noted in the EIR, transportation impacts are presented in a conservative analysis that assumes full build-out in 2000. Actual full build-out, if indeed realized, is not expected by 2000. Therefore, the analysis of impacts double-counts the portion of Rincon Hill transportation demand that would occur by 2000, since that travel is also accounted for in the Downtown Plan EIR cumulative analysis calculation that were used in the Rincon Hill EIR. Due to a number of factors (e.g. market forces, finance rates), however, it is not possible to project with certainty when it would be expected after 2000. Likewise, it is not known what additional transit improvements might be planned or implemented in the 21st century, although it is reasonable to expect that planning for improvements will continue. Depending on when full build-out occurs, transit demand may be served by future measures that are not assumed in the EIR analysis.

Table 14 in the Draft EIR, shows that MUNI service in the northwest corridor was operating at a Level or Service (LOS) E in 1984 and would operate at D in the year 2000 (rather than dropping from D to E as suggested in the comment). Full build-out of Rincon Hill analyzed as though it would occur in 2000 could cause the northwest corridor to remain at Level of Service E. However, if double-counting could be eliminated, the calculations could show Level of Service D. These LOS do not include all improvements planned for the MUNI. For example, neither the MUNI Metro Turnaround nor the Metro extention to Fourth and Townsend Streets are included in the analysis; they are included as part of general mitigation measures. (See also Responses to Comments on the Downtown Plan FEIR, Comments and Reponses pp. E.64-68, which discusses transit mitigation for cumulative impacts and explains that implementation of a few key measures would permit further reductions in auto use and still allow all transit services to operate within acceptable Load Factors (Dorbetter).)

The EIR does describe improvements to Muni which are not assumed in the Rincon Hill EIR analysis. The measures are being evaluated as part of the I-280 Transfer Concept Program. The Final EIR for the program analyzes possible transportation system improvements that could be implemented with monies that were allocated for the completion of Interstate Highway 280 which is no longer planned. These measures are outlined on p. 110 of the Rincon Hill EIR and are described in greater detail in the Transportation Mitigation section of the Downtown Plan FEIR (EE81.3, Certification October 18, 1984), pp. V.E.1-30, which is hereby incorporated by reference: 1) Construction of the Muni Metro turnaround at the foot of Market Street; 2) Extension of the Muni Metro to the Southern Pacific depot at Fourth and Townsend Streets; 3) Creation of a new E-line streetcar between the Southern Pacific depot and the Fisherman's Wharf area. Implementation of these measures would provide direct service from the downtown to Rincon Hill residents and employees, and transfer connections to other areas of the City. This additional service, if implemented, would likely increase the proportion of people choosing transit as their primary mode of travel, and reduce the number who drive private automobiles.

COMMENT

Richard Anderson

> "With regard to traffic, First Street, Harrison and Folsom experience very heavy congestion during the peak periods. That's level of service F right now, with delays of roughly one and two hours, or congestion occurring between one and two hours during the evening peak. The plan projects that congestion to increase to three hours by the year 2000, assuming that build-out occurs by that period.
>
> At present, this congestion is costing our company roughly $9,000 per year in terms of labor costs, delays in getting to and from our office. We have access only from First Street, and this access is fairly impeded during the evening rush. Unfortunately, our business, general contracting, is of a type which cannot shift work hours to take advantage of non-peak traffic levels. The economic costs which we incur will therefore only increase as traffic worsens. Other blue-collar businesses on Rincon Hill can likewise expect to suffer as a result of the City's lack of comprehensive planning policies.
>
> Peak period congestion intensifies the noise and air pollution impacts generated by automobile traffic within the Plan area. These impacts, in turn, reduce the suitability of Rincon Hill as a location for homes. Particularly affected is Assessor's Block 3749, which is surrounded by streets and freeways experiencing extremely high levels of congestion."

RESPONSE

The above response on p. 42 addresses traffic congestion problems in the Plan area. The EIR clearly acknowledges this condition, particularly at First and Harrison Streets, which operates at an existing Level of Service F. This problem has long been experienced at this intersection. It is not expected that implementation of the Plan would in itself create a change in the level of service at which the intersection operates per se. However, if successful

in its objectives, the Plan area could provide housing for workers who would otherwise commute to the City for work. In an overall context, the Rincon Hill Plan is one of a number of mitigating measures to address the impacts associated with downtown growth, which is the primary contributor to the congestion at First and Harrison Streets. These are all discussed in the Downtown Plan Final EIR.

For information on additional air quality and noise studies conducted for Rincon Hill, please refer to p. 55 and p. 60, respectively.

COMMENT

Richard Morten, Chamber of Commerce

"Caltrain's extension to downtown: The Rincon Hill EIR only in passing mentions the I-280 transfer concept study EIR-EIS of the Caltrain extension to downtown. In our opinion the Caltrain downtown extension could have significant adverse impacts upon land use, air quality, noise and delays in residential construction. A more adequate discussion of these impacts should be provided.

Embarcadero Freeway Removal: The preliminary draft I-280 transfer concept study EIR/EIS indicated the removal of the Embarcadero Freeway would shift traffic congestion to the South of Market. The Rincon Hill EIR does not adequately discuss the potential impacts if the freeway (SR 480) were removed and as a result downtown traffic, which would otherwise use the Embarcadero Freeway ramps at Broadway and Clay/Washington Streets, would divert to the Rincon Hill project area. The practical implication of this influx of automobiles would be a significant and possibly unacceptable reduction in the quality of the residential environment which the Rincon plan hopes to create. On the other hand, if the freeway were maintained the duration of congested conditions during the peak commute hour would not appreciably change from those conditions now found in the project area. A more thorough analysis of the impact of the removal of the Embarcadero Freeway on land use, transportation, traffic, parking and residential livability should be provided. If the Embarcadero Freeway is removed the Rincon Hill EIR should recommend mitigation measures (e.g. alternative ramp location and traffic control measures) that will reduce the impacts on the project area.

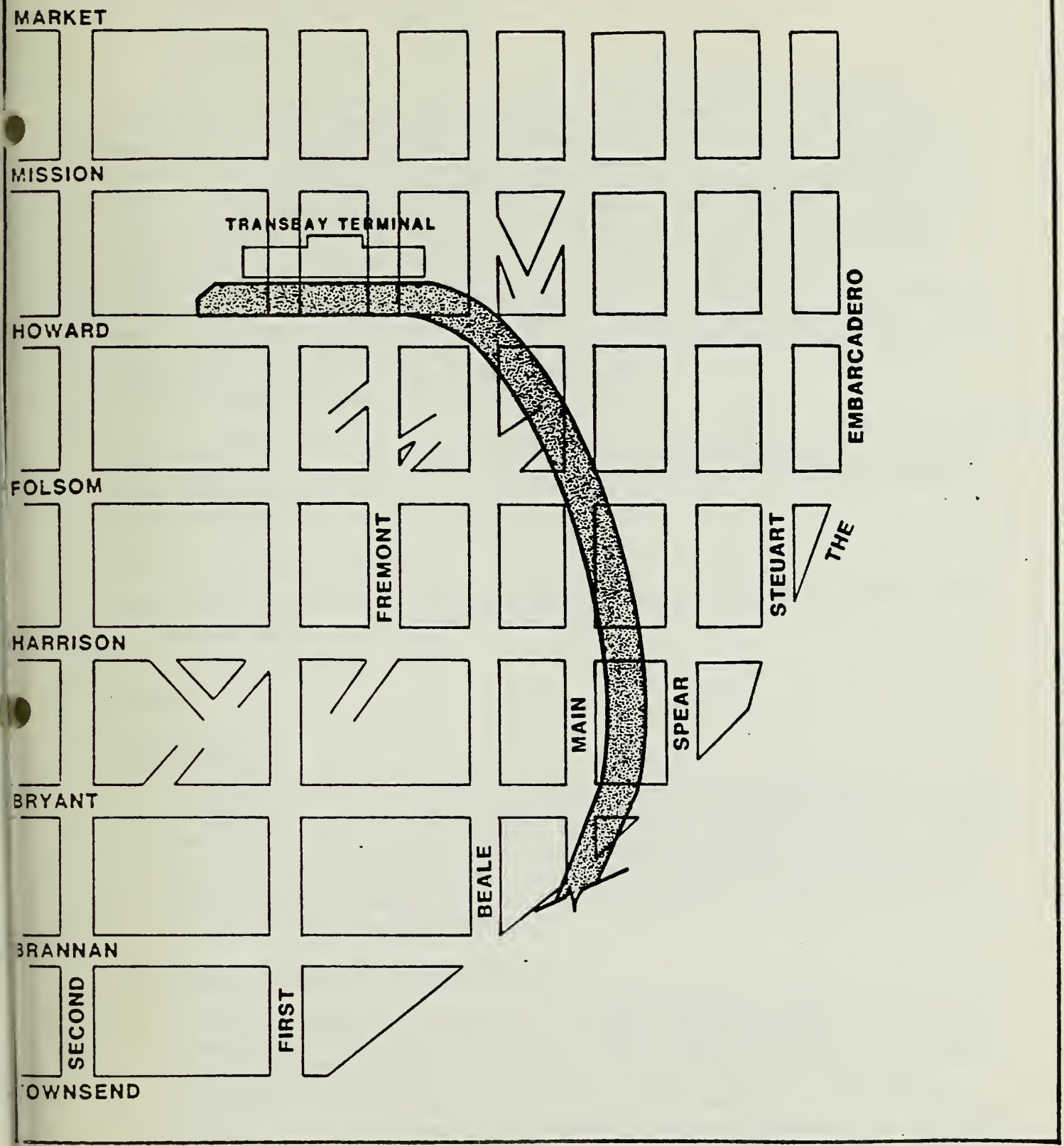
SCR 74: At the first meeting of the SCR 74 (the MTC highway 101 rail transit study) advisory committee there appeared to be confusion between City Planning and PUC staff over the Muni Metro turnaround along the Embarcadero and the breakout and extension to the Southern Pacific terminal. There is a possibility that the Rincon Hill transit analysis could reflect this confusion. Perhaps the two city staffs should discuss this matter."

RESPONSE

The Rincon Hill EIR only touches upon the impacts of the I-280 Transfer Concept Program, which is the subject of a Final EIR, published May 23, 1985. The I-280 EIR analyzes eight separate alternatives of new transportation facility treatments to the Northeastern Waterfront Area, any one of which or permutation thereof could be adopted. Circulation patterns would be affected by all of the alternatives.

The proposed Caltrans' Peninsula Commute Service (PCS) extension to downtown San Francisco is included in Alternatives V, VA and VI. Alternatives V and VI evaluate extensions to Rincon Annex that are at or below grade. Caltrans has indicated that this alignment is no longer feasible because of right-of-way costs. Further, there is no railroad station proposed at Rincon Annex. Alternative VA includes a subway extension to the Transbay Terminal (see Figure CR-51) that would enter the Rincon Hill Plan area at Bryant and Main Streets, whereupon it would parallel Main Street to Folsom Street. In the Rincon Hill Plan, the portion of Main Street between Bryant and Harrison Streets is proposed for inclusion in Subarea Three (Commercial/Industrial). Between Harrison and Folsom, Main Street would be contained in Subarea Two (Mid-rise Residential). Caltrans has indicated that they are strongly committed to this project. The project is included in the MTC New Rail Starts Program as well as in the Senate Concurrent Resolution 74 (SCR #74) Study.

The land use impacts of extending the PCS are not well defined in the I-280 Transfer Concept Program EIR. However, it appears that the timing of the rail construction would affect development decisions along the Main Street right-of-way, as construction would likely involve a considerable amount of street excavation. A railway extension along Main Street would be disruptive to the residential mid-rise zone. Access to the Main Street parcels is likely to be materially impeded for a period of one to two years. If housing and commercial construction preceded the rail extension, noise impacts could be significant. The full undergrounding of Peninsula train service would create less of a noise problem than an at-grade extension. However, ventilation shafts for the diesel subway could pose some physical design problems as well as localized air quality impacts. Routing of a PCS extension is not well defined either, as there are a number of soil conditions that would need to be resolved before building an underground subway. Any additional address of the concerns that is included in the Final EIR for the I-280 Transfer Concept would not represent the final stage of analysis. The I-280 Final EIR will only provide information to assist Caltrans and the City of San Francisco to determine which is the preferred alternative (or permutation). A staff report is currently being prepared that would describe which components of the I-280 Study are recommended. The recommendation would be the subject of public hearings held by the City Planning Commission, the Public Utilities Commission and the Redevelopment Agency Commission, before being heard by the Board of Supervisors. The actual proposal could be changed any number of times during the public review process. More detailed analysis will be required for the selected alternative, including additional environmental review. At this time, it is impossible to prejudge whether or not the PCS extension will survive the selection process that must be approved by the Board of Supervisors, the Metropolitan Transit Commission (MTC), the State of California, and the federal government.



IGURE CR-51: PROPOSED PENINSULA COMMUTE
ERVICE (PCS) EXTENSION

NOT TO SCALE

The Rincon Hill EIR does consider impacts with and without the elevated Embarcadero Freeway, the removal of which is included in five of the eight alternatives of the I-280 EIR. The scenario of removal of the Embarcadero Freeway, as it would directly affect the Rincon Hill Plan area, assumes the removal of existing ramps at Folsom/Beale Streets and Folsom/Fremont Streets, and the installation of a new off-ramp at Folsom/Spear Streets. This is more fully described on p. 104 of the EIR. Under this condition, peak period traffic that would otherwise use the Embarcadero Freeway ramps at Broadway and Clay/Washington Streets would likely be diverted to the existing First/Harrison Street on-ramp and Fremont/Harrison off-ramp in addition to the new Folsom/Spear off-ramp. Traffic queuing would increase accordingly. Table 12, p.108 of the EIR expresses traffic conditions with and without the Embarcadero Freeway in terms of level of service ratings for intersections and estimated time durations of congested condition.

Existing traffic queuing in the Rincon Hill intersections of 1st/Folsom & Fremont/Folsom would likely be longer in length but localized in the same areas as current conditions, with a concomitant increase in the amount of time this congestion is experienced./1/

/1/ I-280 Transfer Concept Program, Subtask 1.5.6, Final Working Paper-Travel Demand Forecasting/Analysis, July 1983.

COMMENT

Ron Mulcare

> "I believe that the discussion regarding traffic congestion is inadequate. I point to the fact that here we are talking about narrowing the streets, three of the streets in the area. Although the plan refers to it as widening the sidewalk, the effect of it is to narrow the street by some 16 feet on Beale, Main and Spear. I think it's well known by every person who drives in that area that there is a lot of congestion, particularly at commute time."

Frank Moss, Department of Public Works

> "Sidewalk widenings are proposed for Beale, Main and Spear Streets to provide pedestrian corridors from the development to the north. As you know, there are competing needs for street space, including pedestrians, curb parking and vehicular and transit lanes. A decision to widen sidewalks should not be made until the street network is finalized for this area of the downtown and a street by street assessment has been made of the various needs. Influencing factors include what happens to the Embarcadero Freeway and which streets are ultimately left open or closed along the Embarcadero between Market and Berry Streets."

RESPONSE

Beale, Main, and Spear Streets currently operate as one-way, two-lane local streets between Folsom and Harrison Streets. Traffic volumes on each of these three one-block segments would not substantially increase as a result of Embarcadero Freeway removal, as currently proposed. The increase in local traffic would result from Rincon Hill Plan development. Reducing roadway width from 64 to 48 feet would still allow for 2-lane operation, and would therefore not reduce street capacity because there is currently perpendicular on-street parking on both sides of the streets. Total number of on-street parking spaces would be reduced, however, to accommodate a narrower pavement width, by changing from perpendicular or angle parking to curbside (parallel) parking.

Pedestrian travel patterns could be monitored as the project area builds out, which would allow for block-by-block treatments to remedy problem situations if they occur. Due to the number of transportation related concerns associated with any changes in pedestrian circulation routes, the appropriate forum for discussion is the Transportation Policy Group. TPG meets regularly and is attended by representatives of the various City agencies that provide transportation planning.

COMMENT

Peter Straus, Muni Planning

> "[T]he plan proposes to narrow Beale, Main and Spear Streets from 64 to 48 feet. While we understand the need to create smaller, "friendlier" streets, other uses do need to be accommodated. Our particular concern is Beale Street, which we foresee as our main transit access to both Rincon Hill and to South Beach. As you know, the need for improved transit south of Market has often been raised, frequently by City Planning staff. We would suggest that Beale remain at 64 feet, in order to accommodate two southbound traffic lanes, one southbound diamond lane, one northbound transit only contraflow lane and two seven foot bike lanes. Certainly some type of beautification can allow both traffic flow and the neighborhood to function together.
>
> We should note that we have tentatively selected Beale because it straddles the Rincon Hill area, and would allow good service for both the lower part of the hill and for the higher part of the area. Additionally, until First Street Bay Bridge-bound traffic is improved, reliable service cannot be offered on First Street or on Harrison."

RESPONSE

None of the proposals for sidewalk widenings (Beale, Main and Spear) are mandated by the Rincon Hill Plan. They are only suggested as a means to provide a pleasant atmosphere and pedestrian-scaled connection to the greater downtown. Each proposal would be considered in concert with competing needs for street space, such as vehicular traffic and efficient transit movements.

In order to allow greater transit access to both Rincon Hill and South Beach, Beale could accommodate additional transit service and still be narrowed within the project area to provide better pedestrian scale. The final right-of-way width, whether it be 64' (present) or 48' (as recommended in the Plan), or somewhere in between would be determined according to needs. Potential in future peak period vehicular volumes on Beale in the project area, however, would not appear to require diamond lanes for transit vehicles. Diamond lanes may be required north of the project area. Similarly, conditions on Main Street would not be expected to worsen significantly to warrant change of existing northbound expess bus service to a contraflow diamond lane on Beale.

No final improvements would be implemented without discussion among the City's transportation agencies, to ensure that a proper balance is struck between transportation, pedestrian and urban design needs.

COMMENT

Frank Moss, Department of Public Works

"A pedestrian alleyway system is proposed to be developed along a midblock corridor (between Harrison and Folsom Streets) extending from First Street to the Embarcadero. In reality it will connect from the existing residences on Guy Place to the waterfront. The alleyway systems would encourage pedestrian usage and midblock crossings of six streets, including the Embarcadero, First and Fremont Streets. Currently these streets are heavily traveled and are designated primary vehicular streets. If the Embarcadero Freeway is removed they would become even more heavily utilized. In addition, both Main and Beale Streets would become more important for circulation through the area. At grade pedestrian crossings would undoubtedly require additional signalization and should be discouraged from an operational and safety standpoint. This would be most critical on the Embarcadero roadway operation, particularly under freeway down options, where additional at grade crossings should be prohibited. The design and alignment of a pedestrian corridor should take these facts into consideration."

Peter Straus, Muni Planning

"While we have no problems with the location of most of the midblock alleys, we are especially concerned with the location of the midblock pedestrian right-of-way in AB 3744. This midblock crossing, located on the Hills Brothers property, will encourage a midblock crossing of the present Stueart Street, and a midblock crossing of the Embarcadero to the Bay. This situation will become even worse when the proposed realignments of the Embarcadero, Steuart and the Muni Metro Extension to the SP Depot (as now being studied in the I-280 study) are implemented. Substantial amounts of new traffic will be using the Embarcadero, and Muni subway trains will be operating on the alignment of present day Steuart Street at a frequency of about every four minutes (per direction). All traffic engineering work done to date has focused on making the Folsom/Embarcadero/Steuart intersection as the preferred location for pedestrians to cross the street. This is because a midblock crossing of

Embarcadero will be unsignalized, and will also cause conflicts with Muni operations. There is even an option that Muni trains will be surfacing on the south side of Folsom, thus creating even a greater safety problem. We would request that the pedestrian street in AB 3744 be realigned to exit onto the intersection of Folsom and Steuart."

RESPONSE

The proposed midblock pedestrian alleyway system is designed to "break up" large blocks in the project area to open them for sunlight access, additional parking and pedestrian access to residential development. It would also provide a a lower scale of development keeping more with traditional residential neighborhoods in the City. In this sense, they are no different than other midblock alleyways throughout the South-of-Market and Mission District areas which provide additional direct access to residences.

Currently, there are midblock at-grade pedestrian crossings proposed as part of the alleyway system. The only pedestrian crossing identified in the Plan is a pedestrian bridge over Fremont Street. This concept is acknowledged as a publicly accessible open space opportunity. Their use is anticipated to be by residents, primarily for additional open space free of vehicular traffic.

There are a number of measures that could mitigate this condition (e.g. bollards or rails to block pedestrian crossing at mid-block, with signage to direct them to proper crossing areas). However, at the Plan level, this detail is not appropriate to decide until designs are available for review and consultation among various City agencies, including MUNI and the Department of Public Works, in order to meet varying needs within the constraints identified.

COMMENT

Frank Moss, Department of Public Works

"The residential development options would allow a one to four ratio of off-street parking to dwelling units. We feel this is too low. Although we agree that it is desirable to keep the number of private vehicles entering San Francisco daily to a minimum, it is unfair to allow housing to be built without adequate off-street parking for the residents. Our office is continually receiving complaints in areas where insufficient off-street parking is available to the residents and their visitors. Residential parking should be made available at much closer to one space for each unit."

Rin Ten Ten

"We are concerned that the proposed parking ratios (1/4:1 minimum, 1:1 maximum) are too low. Also there is no distinction made in the report between units for sale and units for rent. Units for sale will need at least 1:1 parking to be viable in their own marketing terms. Rental units typically need parking up to 1:1 as well. We feel that 1/4:1 may be unrealistic, particularly considering that many "middle income" rental units are shared by two people who may each own a car. The study bases its parking projections solely on the Golden Gateway in 1980. A project

of the magnitude of Rincon Hill needs a much broader data base. We do not want to have to fight thousands of new neighbors for the only places we have at present to park, namely the curb spaces in front of our houses. We will need protection to maintain the equivalent of existing on-street parking."

RESPONSE

The main purpose of the proposed Rincon Hill Plan is to adopt policy that actively promotes Rincon Hill as a housing resource area. Because the City does not control any of the affected property, the objectives and policies of the Plan are flexible in an effort to make housing development in the area as attractive as possible. For this reason, the Plan does not specify whether the housing should be made available for ownership or rental occupancy.

This flexibility extends similarly to parking requirements. The range in parking requirement is proposed in order to adapt to innovative schemes that can use parking areas more efficiently and minimize the presence of massive parking facilities which often detract from neighborhood character, while still meeting anticipated demand. This is the concept behind shared parking facilities in mixed use developments, where residents whoc do own vehicles may utilize commercial parking spaces that are used primarily during the daytime.

The flexibility also accommodates for future changes in travel patterns as downtown workers use means other than private vehicles to to to work. Parking policies of the Plan are reflective of the City-wide transit improvement planning currently underway, which is described earlier on pp. 43-44. If implemented, the Rincon Hill area would be serviced at a level comparable to what is available in the Downtown. Under these circumstances transit is a more efficient means of travel and may influence auto ownership ratios for residents of the area. While sampling is limited to one development, market-rate residences in the Golden Gateway Redevelopment area have borne this out. The auto ownership rate for this area is .51 vehicles per unit. Golden Gateway is the only mixed-use development in operation which offers a comparable arrangement to evaluate.

Individual residential project proposals would be reviewed as to unit size, price and anticipated resident characteristics. In this way the most appropriate ratio of parking spaces to dwelling units can be applied to each individual situation. For example, rental (or even market rate) studio units might appropriately need to provide only 1 space for every 4 units, but a project with 2-bedroom units would more likely require parking at a 1:1 ratio. The flexible requirement and proposal for shared parking between residential and commercial uses would provide opportunities to maximize the utilization and efficiency of costly off-street parking, thereby creating an incentive for developers to invest in construction.

COMMENT

Richard Anderson

"Although the DEIR discusses traffic impacts that are anticipated to occur under build-out of the Rincon Hill and Downtown plans, it entirely ignores mitigation of the resulting congestion. This is a serious omission in that congestion creates economic impacts on local businesses and reduces the liveability of proposed residential areas.

...Both the Rincon Hill Plan and the EIR should address methods of shifting surface traffic to a corridor that is near neither businesses nor residences. One way to accomplish this shift would be to modify Essex Street so that it becomes a one-way Primary Vehicular street providing access to the Bay Bridge. To be effective, however, this modification requires that Essex be extended to First Street south of Howard, and that it be depressed below grade at both the Folsom and Harrison intersections. The capacity of Essex should concurrently be increased to at least six lanes. Access to the Bridge on-ramp at Essex could be controlled through a set of signals designed to smoothly funnel traffic from six or eight lanes down to the existing single lane bridge merge. (A similar system of signalization is successfully used at the east end of the Bay Bridge.) The success of this funnel will require removal of the Bridge on-ramp at First Street, which consequently returns the functions of First, Folsom, and Harrison to those of local streets consistent with the needs and character of the Rincon Hill Plan.

The proposed reconfiguration of Essex is relatively easy to implement in that most (if not all) of the required rights-of-way are already in public ownership. The remaining costs, primarily construction, should be financed in part or in whole using funds originating from the Bridge District."

Rin Ten Ten

"The EIR notes that "Level F" (grid lock) will take place daily for a two to three hour period on First Street. However, the report assumes that traffic increases are inevitable. We feel the EIR is inadequate if it fails to address the possible mitigation of this grid lock condition. Alternatives include extending Essex Street to re-route traffic around the residential development, and designating the First Street on-ramp to the Bay Bridge for car pool commuters only. These and other alternatives should be considered."

Peter Straus, Muni Planning

"The present congestion at First and Harrison is due to the capacity of the Bridge, and not to the entry of AC Transit buses, which enter the Bridge in lane number 2 [the south side of the Bridge], as opposed to the entry of First Street traffic which enters the bridge in lane number 1 [the north side of the Bridge, on the Rincon Hill side]. We believe the present Beale Street HOV ramp is working well, and should not be moved.

The main problem with this plan, in terms of dealing with Bridge traffic and with the demolition of the Embarcadero Freeway, is the failure to provide adequate queuing space for single occupant automobiles desiring to use the bridge at heavy travel times. Until that problem is solved, congeston will continue. Even if the First Street ramp, for example, was converted into an HOV only ramp, the current levels of traffic would continue, and would probably only cause worse congestion at other locations, notably Second Street for the Sterling ramp.

We believe that there may be an answer to the mutual problems of traffic congestion, improving the environment around the crest of Rincon Hill and encouraging carpooling. Certainly, the City wishes to make the Rincon Hill neighborhood as desirable as possible. That's a tough order, since the area is daily subjected to an onslaught of automobiles.

...The solution to these problems is to find more queuing capacity for the Bridge approaches, in places where Bay Bridge bound automobiles will not inconvenience either local street traffic or the residents of the neighborhood.

We are offering one alternative, and we acknowledge there may be other alternatives. Under our suggestion, Essex Street would be converted into a one way, five lane street onto the Bridge. Additionally, it would be extended from its present ending at Folsom to First Street, by using the right-of-way under the Main Street Exit/Embarcadero Freeway structure. Motorists bound for the Bridge would then use First Street to roughly Clementina, where Essex would begin. Essex would be four lanes between First and Folsom and five lanes south of Folsom (allowing a separate lane for traffic coming off of Folsom). Left turns from Harrison into the Essex Street on ramp would be prohibited, and if funding permitted, the intersection should be grade separated. If a grade separation can be built, then the Essex Street on ramp should be signalized and metered (this would improve flows into the bridge and reduce the 5:00 p.m. chaos that now exists at First and Harrison). A lesser priority would be to grade separate Essex and Folsom.

The existing ramp at First Street would be eliminated and First Street would be narrowed and used primarily as a local circulation street. The advantages of this proposal are as follows:

1. Traffic would be reduced on First Street, and rerouted onto Essex Street. There are no frontages on Essex, and the street is built below the level of Rincon Hill, so it is hidden from view.

2. Carpools and vanpools would still benefit because they would have a completely unmetered ramp on Sterling, while single occupant autos would be subjected to long delays attempting to get on the Bridge from Essex.

3. Queuing capacity would be increased from roughly 2,450 lane feet (1,225 feet of street on Essex and First times two lanes) presently, to about 6,410 lane feet (1,425 feet of street on proposed Essex times 4.5 lanes)

4. It is possible that these improvements may be funded through Bridge tolls, because they can be defined as a project that maintains or improves the functioning of the bridge."

RESPONSE

The idea of extending Essex Street to intersect First Street near Clementina to provide full or partial grade-separated access to the bridge has some merit. It could effectively transfer vehicle queueing and congestion to a facility with no property frontage, thereby reducing direct cumulative impacts of development on property owners along First Street, Guy Place and Lansing. There are, however, serious questions regarding the feasibility of the proposal.

There would be engineering difficulties with such a proposal. Acceptable grades for depressing Essex underneath Folsom are improbable, given the short distance from First and Clementina Streets. Similarly, the grade from a depressed Essex Street at Harrison up to the elevation of the bridge would be unacceptable. In its existing condition, the grade of the Essex Street ramp is already higher than recommended. Steep grades have the effect of reducing vehicle capacity, because vehicles travel at reduced speeds. Also, widening of existing Essex Street public rights-of-way to provide additional lanes (with acceptable lane widths) could require purchase of private property; extension of Essex north of Folsom might also require purchase of private property.

From a cost-benefit perspective, the proposals described by the commentors would not likely justify the cost of such undertakings. It is also unlikely that Caltrans, through its bridge toll collections, would be the only funding agency. Strictly defined, Caltrans is responsible only for the portion of Essex Street between Harrison and the bridge. The City of San Francisco would be expected to commit substantial funds and services to implement such improvements. According to the Caltrans Highway Opertions Unit, there is little else that can be done to further increase the efficiency of the bridge ramps, or more directly, bridge capacity. Moving the queueing area over does not have any particular merit for Caltrans' interest, and would be difficult to justify given the number and type of other programs competing for relatively limited funding. (Telephone conference: Lynn Newman, Caltrans Highway Operation Unit, January 17, 1985.)

Regardless of operational design and land ownership questions, the proposal would have the primary effect of only shifting congestion from one location to another, albeit less problematic, location. However, the proposal would not mitigate or reduce impacts resulting from cumulative (primarily downtown office) development. The Rincon Hill Plan is itself one of the mitigation measures addressing cumulative development as identified in the Downtown Plan Final EIR (EE81.3) by providing a significant amount of new housing close to downtown employment.

AIR QUALITY

COMMENT

Richard Anderson

"A major failing of the DEIR is that its air quality data is entirely inadequate for determining if housing is an appropriate use for the western end of the Plan area, particularily Assessor's Block 3749. This block is ringed by high volume traffic corridors and, as a result, is likely to experience violations of air quality standards for carbon monoxide (CO) and particulates (TSP).

Carbon Monoxide

The DEIR projects curbside CO concentrations at two selected intersections - Bryant and Second, and First and Harrison - and concludes that no excesses of CO standards are anticipated at either location. These projections, however, rely on an extremely small data base utilizing CO readings from only one location - 100 Harrison - in the Rincon Hill area. When contrasted to Assessor's Block 3749, this monitoring site lacks the block's proximity to major traffic routes and, because of the height of the Bay Bridge and the Embarcadero Freeway, experiences microclimatic conditions which lessen auto-generated air quality impacts. Thus, the projections of CO concentrations for the First and Harrison intersection are most probably low; CO standards may indeed be violated under existing and future traffic conditions.

Particulates

With regard to particulates, the DEIR states:

> Emissions of TSP generated by Plan build-out and cumulative development would increase TSP concentrations, which could increase the frequency of TSP standard violations in San Francisco, with concomitant health effects and reduced visibility.[7]

This statement is grossly insufficient given the residential emphasis of the Rincon Hill Plan. Epidemiological studies have found that death rates for respiratory deseases rise in direct relation to increases in average particulate levels in the area of residence. Adverse health effects have been noted when the annual geometric mean level of particulate matter exceeds 80 micrograms per cubic meter. At present, this level is quite possibly being exceeded in the Plan area - particularily on Assessor's Block 3749. For example, when we open the windows of our office, all horizontally exposed surfaces will, within hours, exhibit a gritty black deposit of particulate matter. The DEIR, however, contains no data regarding either existing or projected TSP levels on Rincon Hill. We are concerned about the safety of this area and are therefore willing to allow the City or the Bay Area Air Quality Management District to install monitoring devices on our property.

This parcel [at First Street and Guy Place] is surrounded on all sides by major traffic corridors. First Street is a primary vehicle corridor. Same with Harrison and Fremont. And also Folsom Street. We are also very close to the Embarcadero Freeway and to the Bay Bridge.

Frankly, we don't feel that the data in the EIR supports or indicates that Assessor Block 3749, which is that block surrounded by those roads, is a healthy place for residences. We feel that the data regarding carbon monoxide impacts is based upon readings from 100 Harrison, which is down near Spear, which is much too distant from our location to extrapolate, given the roll-back model which was used in the EIR.

We also feel that the projections, well, we also find that there were no projections at all or any existing data regarding particulates for that area. And I can state right now that if I open the window in my office for more than several hours, my desk will be covered with a thin black gritty material.

Basically, we don't believe that the EIR supports the conclusion that that block is safe to live on or that it should be used for low or medium density residential units.

Monitoring of "hot spots" for carbon monoxide levels was taken at Harrison Street between Main and Spear. This is the least representative part of the area in view of the fact that the project is surrounded on three sides by freeways. True and accurate readings should be taken in close proximity to the freeways at, for example, Guy, Lansing and Folsom. At the very least, the EIR should include measurements of CO and TSP taken at representative locations throughout the Plan area. If these readings, or the projections made from them, indicate violations of air quality standards, then mitigation measures must be discussed in the final document. Mitigation measure should include:

- Air-conditioning/filtering systems in residential building design (with, of course, corresponding reductions in housing affordability).

- Redistribution of land used depicted in the Rincon Hill Plan. If Assessor's Block 3749 is indeed an unhealthy place to live, then it should be designated for either (a) Residential Highrise situated directly above low- or mid-rise Commercial/Industrial,[8] or (b) highrise Commercial/Industrial. If using the latter option, the displaced residential units should be redistributed to other parts of the Plan area."

RESPONSE

Curbside carbon monoxide (CO) concentrations at selected intersections affected by cumulative development traffic (based on the Downtown Plan EIR growth projections), and by project-generated traffic, were projected for worst-case conditions and are compared with the ambient standards in Table CR-5. The CO information was prepared for the Final EIR and augments air quality analysis in the Draft EIR. These projections were calculated using a revised version of the Modified Linear Rollback (MLR)

method, which was developed for the Downtown Plan EIR. The intersections selected encompass the Rincon Hill Plan area, as well as reflect locations that experience the highest vehicle volumes (First/Harrison Streets and First/Folsom Streets). Based on the new analysis, the EIR has been amended. The text on p. 119 and Table 18, p. 118 are deleted from the Draft EIR and would be replaced with the text below:

"Curbside carbon monoxide (CO) concentrations at selected intersections affected by cumulative development traffic (based on the Downtown Plan EIR growth projections), and by project-generated traffic, were projected for worst-case conditions and are compared with the ambient standards in Table 18. The eight-hour CO standard is currently estimated to be exceeded at the Steuart/Harrison/The Embarcadero intersection and at the First/Folsom intersection. CO concentrations are projected to be less in 2000 than in 1984, and would not exceed the applicable CO standards at any location analyzed, under any future scenario. Although full build-out of Rincon Hill would not occur until sometime after the year 2000, it is assumed for the purpose of comparison that the average vehicle emission rates would stabilize and remain constant after 2000. In 2000 (according to the Downtown Plan EIR), area-wide traffic volumes in the downtown area would increase by about 15% over 1984 volumes; average traffic speeds would decrease by about two mph from 1984 average speeds. However, in 2000 the average vehicle is expected to emit 43% less CO than in 1984 due to ongoing state and federal emissions controls. The projected effects of these controls on new vehicles (and the retirement of older, more polluting vehicles) would more than offset the increases in traffic volumes and traffic congestion due to cumulative and Plan full buildout.

Curbside CO emission data included in the Rincon Hill EIR (on p. 118) were taken from the analysis prepared for the Downtown Plan EIR. Modifications to that analysis for the Downtown Plan Final EIR eliminated data for the intersection of Bryant and Second Streets. Consequently, the Bryant and Second Street air quality data for the Rincon Hill EIR has been removed. The elimination of this intersection, however, is compensated by the new locations analyzed for the Rincon Hill FEIR, which are actually within the Plan area; the Bryant and Second Street intersection is not.

The new CO calculations incorporate factors to obtain concentrations that reflect conditions at any given intersection. Actual CO monitoring has occurred at only selected locations in the City, one of which was the intersection at 100 Harrison (at Spear) Street. The measurements from these monitoring points establish base ratios which are factored in the air quality computer model with traffic volumes taken from the intersection being modeled.

In the case of the air quality analysis performed for the Rincon Hill Plan EIR, the ratio used in the model is based on monitored data taken at the intersection of Geary and Taylor Streets, which is considered to be one of the worst-case conditions in San Francisco. The monitored data from 100 Harrison Street, which does not experience comparable emission levels, was not used in the modeling. It was referenced on pp. 59-60 in the Setting chapter for informational purposes to indicate what CO concentrations were within certain parts of the Plan area. The air quality analysis in the EIR thus incorporates worst-case assumptions.

Total Suspended Particulates, or TSP, is not considered to be a serious air quality problem in San Francisco. (Irwin Mussen, Bay Area Air Quality Management District, telephone communication: November 20, 1984). In San Francisco, the old State TSP standard of 100 mg/m^3 for 24 hour average was exceeded on four days in 1983. There were no exceedances of Federal standards. State standards for particulate matter, however, changed in 1983 to concentrate on fine particulate matter, that which has been demonstrated to have health implications through inhalation. Based on a number of health studies, fine particulates are defined by the California Air Resources Board (CARB), a State agency, as particulate matter that measures 10 micrometers or less in size (PM10). Further, a new concentration standard of 50 micrograms (ug) per cubic meter (m^3) was adopted. Changes are underway to similarly modify standards at the Federal level as well, and are currently being reviewed by the EPA.

Because of these changes, there no standard method for monitoring for fine particulate matter. CARB is evaluating a number of monitoring instruments that may be adopted as the State-approved measuring device. Until such time as one is adopted, there is no way to determine what proportion of TSP in San Francisco falls within the PM10 category and would thus be subject to review against the new standard. In the interim, there is no State policy to direct the regional districts on how to monitor or analyze particulate matter. On a general State-wide level, an approximate ratio of PM10 to TSP is 0.55, with the range being from 0.4 to 0.6. However, the diverse climatic conditions, changes in season, and array of sources in any given location/jurisdiction make the applicability of this ratio very limited. (Caroline Stromberg, California Air Resources Board, telephone communication: December 13, 1984). It is expected that a monitoring instrument will be approved by the State in 1985.

It is expected that the majority of future proposals for development would be submitted for review after the monitoring standards have been established, and would be subject to such procedures and applicable mitigation measures at that time. A mitigation measure currently exists and is applied to individual projects for particulate matter generated during construction phases which requires frequent watering to minimize airborne matter.

Information in Table 17, p. 118 of the EIR estimates how much particulate matter would be generated in the project area, assuming the traffic levels analyzed in the Transportation impacts section. However, this information does not provide insight into the concentration (i.e. emissions per unit of space) levels, which are the terms addressed by State and Federal standards.//

TABLE CR-5: EXISTING AND PROJECTED CURBSIDE CARBON MONOXIDE CONCENTRATIONS AT SELECTED INTERSECTIONS

Intersection	Averaging Time	Concentrations (ppm)/a/ 1984	Downtown Plan 2000/b/	Downtown Plan 2000 Plus Project
First & Harrison	1-hour	10.9	8.1	8.7
	8-hour	8.4	6.1	6.8
Folsom & The Embarcadero	1-hour	11.4	8.3	8.4
	8-hour	8.8	6.3	6.5
Steuart & Harrison & The Embarcadero	1-hour	11.7	8.0	8.3
	8-hour	9.4	6.6	6.7
First & Folsom/c/	1-hour	14.6	10.4	10.6
	8-hour	11.1	7.8	8.0

/a/ Calculations for all scenarios were made using a revised version of the Modified Linear Rollback (MLR) method described in the Downtown Plan EIR. Background concentrations were calculated to be 7.4 ppm for one hour and 5.7 ppm for eight hours in 1984, and 6.0 ppm for one hour and 4.5 ppm for eight hours in 2000. Underlined values are in excess of the state or federal standards. The one-hour state standard is 20 ppm, the one-hour federal standard is 35 ppm, and the eight-hour state and federal standards are 9 ppm.

/b/ Based on the growth projection methodology contained in the Downtown Plan EIR, Table IV.I.3, p. C&R-I.8.

/c/ Calculations for the First/Folsom intersection also include emissions generated by that portion of the Embarcadero Freeway which is within the MLR model's local emissions box. The contribution of the Embarcadero Freeway at this location is calculated, using CALINE3, to be 2.4 ppm for one hour and 1.8 ppm for eight hours in 1984, and 1.4 ppm for one hour and 1.1 ppm for eight hours in 2000.

SOURCE: Environmental Science Associates, Inc.

NOISE

COMMENT

Harvey Collins, Health Services

> "The information concerning noise level increases as a result of project induced traffic increases should be clarified. On page 123, for example, it is stated, "Traffic generated . . . during any hour (emphasis added) . . . cause noise levels to increase by less than one dBA on any of the adjacent streets." But in Table 10 (page 102) the net trips added during the peak hour is 11,400 as compared to 1,700 existing trips, which increases noise levels by about 8 dBA. Increases in noise levels of similar magnitude on any street should be expected if the increases in traffic due to the project on the streets are proportional to existing traffic; i.e., an increase of about 6.55 times in ADT or peak hour traffic."

RESPONSE

As noted in the noise setting section on p. 61 of the EIR, noise conditions in Rincon Hill (as with most areas of San Francisco) are primarily a reflection of vehicular traffic activity. The noise impacts of the Rincon Hill Plan, however, cannot be estimated by relying solely on Table 10, p. 102 of the EIR, which indicates trip generation of the proposed Plan, for two reasons.

First, the trips expressed in Table 10 are person trip ends (PTE). In order to analyze noise impacts, it is necessary to determine how many vehicle trip ends (VTE) are generated. That is, of the total trips that would be made by people using all modes of travel (e.g. auto, transit, pedestrian), the number of trips made by vehicles only (primarily automobiles) must be calculated. Such VTE information is not specifically indicated in Table 10. Taking the 13,100 new PTE generated by full build-out of the Plan, as indicated in Table 10, there would be an estimated increase of 2,000 VTE that would result. (VTE and other background transportation calculations are available for public review at the Office of Environmental Review, 450 McAllister Street, 5th floor, San Francisco, CA 94102).

Similarly, the 1,700 PTE indicated in Table 10 represents total person travel generated by existing uses in Rincon Hill, only a portion of which would be made by automobiles. The traffic generated by existing uses in Rincon Hill however, does not represent the only traffic that exists in Rincon Hill. The Rincon Hill area in particular experiences travel conditions that are affected more by traffic originating from locations outside of Rincon Hill than from within. Its proximate location to the Bay Bridge and Embarcadero Freeway make the area a central access point for downtown commuters, the traffic of which has more of an influence on noise conditions in Rincon Hill. The estimated 2000 VTE from full build-out was compared to these traffic totals (Rincon Hill plus "through" travel). As a result, noise impacts of the proposed Plan would not be expected to be noticeable to the average observer.

COMMENT

Harvey Collins, Health Services

"The City's Environmental Protection Element was adopted in 1974. Since that time, the City and its traffic patterns appear to have undergone significant changes. Thus, there is some question whether or not noise levels at the project site are about "65 and dB" (sic, page 61), particularly in light of the estimates that the center of the site is surrounded and intersected by streets with L_{dn}=70 dB. Moreover, if noise levels on First and Main, as examples, increase beyond those shown on page 61 (L_{dn}= 70 dB), it is doubtful that the "... noise buffer for the open space encouraged in Subareas One and Two" (page 121 and Figure 32, page 89) will be as effective as anticipated.

In addition to the requirement that exterior noise levels be reduced to CNEL 45 dB indoors (page 121), Title 25 of the California Administrative Code requires noise level reductions between dwelling units. Are these normally applied to multifamily dwellings in San Francisco?"

Commissioner Rosenblatt

"Page 61 & 121: Readings should be taken within the project area - including possible open space sites.

Projected estimates should be attempted on noise levels in the residential buildings and open spaces - ground level and roof level with and without the commercial and office buildings in Subarea 3.

Page 122, why is rating A okay for noise at 65 - 70 for open space, but not for residential - open space needs concern for noise, too."

Commissioner Bierman

"Page [120 to 124], we need a table showing proposed noise levels in each subarea. It should show very clearly if noise will be a major problem in marketing. Will people be able to use balconies even? And in that, it seems to me that if we are planning this kind of intense housing, it becomes more important for us to find places for some ground-level open space, then study how it would be buffered from the freeway noise and from pollution, and plan that as we are planning the area.

Page 121, please do a better job of analyzing noise impacts where the rooftop open space is planned on intercept parking garages."

RESPONSE

Noise levels described in the Draft EIR are discussed on two levels. On one level, noise measurements are taken for individual streets and thoroughfares, which are the primary point sources in Rincon Hill. Over the greater area, the generated noise is dispersed, contributing to the ambient, or background, level of undifferentiated sound, which is lower than the point sources.

To augment the noise information contained in the Draft EIR, additional monitoring was conducted for the Final EIR, to better evaluate noise impacts on open space and residents in highrise buildings. The EIR is thus amended, replacing the first three paragraphs on p. 123 of the Draft EIR with the text below:

"Two 24-hour noise measurements were conducted within the project area./1/ The first was taken on November 28-29, 1984, on the roof of the Union Oil building at 425 First Street, to determine worst-case noise impacts from the Bay Bridge freeway on structures within the proposed highrise residential district. The CNEL/2/ calculated from this measurement is 76 dBA./3/ The second measurement was taken on November 29-30, 1984, on the roof of the 59 Harrison Street building, to determine worst-case noise impacts from the freeway and other local noise sources on rooftop open space proposed for intercept parking structures. The CNEL calculated from this measurement is 77 dBA.

These noise levels are not expected to change appreciably in the future. The dominant noise source in both of the measurements was traffic on the Bay Bridge freeway. Peak-period freeway traffic volumes are already constrained by freeway capacity, and thus would not increase. Off-peak freeway traffic volumes would increase, but probably not enough to increase noise levels significantly. In addition, this effect could be offset by lower average traffic speeds as off-peak congestion increases, because noise levels are more sensitive to traffic speed than to traffic volume.

At the upper levels of the proposed highrise residential structures nearest to the Bay Bridge freeway, the exterior CNEL is estimated (from the measurement location described above) to be about 72 dBA. Interior noise levels generally are about 15 dBA less than exterior levels (with windows open), or about 57 dBA in this case. At this level, noise would interfere with sleep, but not with speech or concentration. Development of residential use in such a noise environment would be discouraged under the Land Use Compatibility Requirements of the Environmental Protection Element of the Comprehensive Plan; if developed, it would be subject to an analysis of noise reduction requirements and inclusion of noise insulation features. In addition, multi-family residential development in such a noise environment would be required by the Department of Public Works, under Title 25 of the California Administrative Code, to have a detailed acoustical analysis performed to ensure that the annualized interior CNEL (with windows closed) does not exceed 45 dBA. This noise level would be low enough to avoid interference with sleep. Implementation of the required noise insulation features could increase rental rates and purchase prices of the units.

At the location of the proposed rooftop open space near the Bay Bridge freeway, the exterior CNEL is estimated to be similar to the measurement above, or about 77 dBA. At this level, noise would interfere with speech, concentration, and the enjoyment of open space amenities. Development of open space in such a noise environment is discouraged under the Land Use Compatibility Requirements of the Environmental Protection Element of the Comprehensive Plan; if developed, it would be subject to an analysis of

noise reduction requirements and inclusion of noise insulation features. For open space areas, however, it would be difficult to achieve a substantial reduction of noise from the elevated Bay Bridge freeway, and still preserve the character of the open space. (For example, enclosing the space might be necessary to reduce noise to an acceptable level but would not be compatible with an open space character).

The recommended noise levels for land uses, taken from the Environmental Protection Element of the Master Plan, are general guidelines, not absolute limits. In the July 1974 study, "Noise in San Francisco", prepared for the City by Bolt Baranek and Newman Inc., which was the source for Master Plan noise policies, it is recognized that "specific local situations, attitudes and conditions concerning the environment may well result in noise levels that are considered acceptable although higher or lower than those shown" (p. 22). Because there are no absolute standards available, they are intended to guide the decision-making process, which must consider technical acoustical data together with socio-economic factors and construction techniques that can mitigate existing, or avoid generating, undesirable conditions.

NOTES

/1/ Measurements were made with a Metrosonics db-306A Integrating Sound Level Meter. The meter continuously monitored the sound pressure level, and calculated a running Leq (equivalent noise level) for each of three time periods during each of the 24-hour measurements, corresponding to those time periods used for the CNEL (see below).

/2/ CNEL, or Community Noise Equivalent Level, is an index based on a 24-hour average of the energy content of the noise, with a 5-dBA "penalty" added for evening noise (7:00 p.m. to 10:00 p.m.) and a 10-dBA penalty added for nighttime noise (10:00 p.m. to 7:00 a.m.), to account for the greater sensitivity to noise during these periods. CNEL is similar to Ldn (day-night average noise level), which does not include a weighting for evening noise (7:00 p.m. to 10:00 p.m.).

/3/ Environmental noise is measured in units of dBA. The dBA, or A-weighted decibel, refers to a scale of noise measurement which approximates the range of sensitivity of the human ear to sounds of different frequencies. The Environmental Protection Element of the Comprehensive Plan classifies various noise levels (expressed as Ldn; see above) according to the following scale: 30 dBA, very quiet; 45 dBA, quiet; 70 dBA, loud; 95 dBA, very loud; and 120 dBA, painfully loud. A 10-dB increase in the level of a continuous noise represents a perceived doubling of loudness; a 2-dB increase is barely noticeable to most people. Hearing damage occurs at a level of 90 dB over an eight-hour period."

COMMENT

Rin Ten Ten

"The impact of construction noise on people inside the project site should be studied because residents live approximately 150 feet from proposed 400' tall highrises."

RESPONSE

Pages 123-24 of the Draft EIR generally describe construction noise impacts with noise level ranges as they correspond to different construction activities. This information is applicable within the Rincon Hill Plan area as well as outside. It is pertinent to the construction of specific buildings which would be developed on an incremental basis. The analysis does not make the presumption that construction on all sites in the Plan area will occur simultaneously, and is not intended to imply that these impacts would occur only outside the Plan area. Thus, residents in Rincon Hill who are in close proximity to a construction site would likely experience noise levels of the magnitudes described (with windows open). During the major construction phases utilizing heavy equipment (the greatest noise generators) which may continue sporadically for two months, it would be difficult to concentrate and carry on telephone conversations, and relaxed conversation would be impossible, creating an annoying and more stressful environment.

ENERGY

COMMENT

Commissioner Bierman

"Page 127, would you please ask PG&E if they can provide enough energy for this plan without nuclear energy and nuclear plants?"

RESPONSE

Energy demand from build-out of the Rincon Hill Plan could be met without relying on nuclear energy. This would reduce system reserve margins. However, the decision as to whether to use nuclear plants to satisfy San Francisco energy needs is an internal policy decision for PG&E. According to PG&E's long-term projections (Long-term Planning Results 1984 - 2004, May 1984, p. 28), nuclear energy will provide approximately 20% of additional energy resources through 2004. Virtually all of this would be generated by Diablo Canyon plants 1 and 2, which has been projected by PG&E to be in full operation this year. There are no plans for new nuclear power plants after Diablo Canyon. In addition, PG&E's long-term energy demand will be met by oil and gas facilities, hydroelectric and geothermal facilities, and other sources such as cogeneration, wind and impacts. PG&E plans to continue receiving most of its natural gas from Canada and Texas under long-term contracts.

COMMUNITY SERVICES/PUBLIC UTILITIES

COMMENT

Babette Drefke

> "San Francisco is unable to handle its present population. To add an additional, anticipated 5,000 in one small area would be a total disaster. Inadequate sewers, water, transportation, traffic congestion, air pollution, lack of adequate police and fire controls would be the bane of our existence. Recent evidence shows that the High Rises make great demands on our fire and police departments."

Rin Ten Ten

> "Fire Due to two to three hour "Level F" (grid lock) conditions, fire equipment access will be seriously hampered in the Guy Place/Lansing Street area. Several years ago, on a Friday afternoon, a fire occurred in a wood structure on Guy Place. Fire protection services were delayed by traffic congestion. As a public safety measure, the EIR should address minute response time during "Level F" conditions in this area. Police Minute response time for police is not addressed, particularly during the two to three hour "Level F" condition."

RESPONSE

The Draft EIR addresses community service concerns on pp. 130-132, wherein spokespersons for the various city agencies did not indicate any environmental impacts, or effects on staffing that could not be mitigated as a result of Rincon Hill development. Transportation (including traffic) concerns are addressed at length on pp. 101-116 of the Draft EIR and on pp. _____ of this document. The discussion acknowledges and elaborates on the extreme congestion generated primarily by commuter travel during the P.M. peak period. Air quality issues are also discussed in the Draft EIR, pp. 117-120, with additional information provided on pp. ____ of this comments and responses document.

Approximate response times by the four fire stations serving the Rincon Hill area are provided on p. 70 of the Draft EIR. Each emergency situation offers different circumstances that the fire department takes advantage of, making the estimation of response times during peak travel periods difficult to provide. Clearly, if there is an absolute gridlock condition (i.e. no movement of traffic), there may be substantial delays. In such situations, other stations would be notified and would approach the call from a different direction. However, in most situations there is some traffic movement, which together with emergency access priority (e.g. proceeding against red lights; running on sidewalks and parking lanes; going the wrong way down a one way street) and alerting sirens/horns, allows fire units to maneuver as necessary (Chief Robert Rose, Deputy Chief of Administration, telephone conference, February 7, 1985). New development in Rincon Hill would be constructed to meet more stringent Life Safety provisions of the San Francisco Building Code, which substantially reduces the occurrence of fire incidents and the potential of fires to spread to adjacent structures. The extent to which greater demand

is placed on the fire department is generally due to an increase in the area's population, which creates the potential for increases in non-fire incidents.

Similar circumstances apply to police response times. Average response times by officers from the Southern District station serving Rincon Hill is about five minutes for high-priority calls. In many instances, officers on motorcycles may respond without substantial delay.

COMMENT

Ron Mulcare

> "The analysis regarding schools is totally inadequate. It starts off with the premise that we don't know who is going to live in the building, therefore we really can't make any analysis.
>
> The very point of an EIR is to reach some determination on this type of point, to determine some type of mix. How many children will be here? How are they going to be served? The EIR merely states that the mix is unknown. We assume that if there aren't enough schools in the near area, that we'll bus people somewhere else. And then it goes on to state: While this plan may take quite a bit of time to implement, we assume that there will still be surplus space in the school district schools that are still available after the school district rents out or sells surplus property.
>
> Well, all of this just turns into total speculation. There is no foundation for any kind of finding regarding the adequacy of the schooling, and I think the EIR admits as much by stating that it doesn't know what's going to happen regarding mix when the very purpose of the EIR is to determine some type of mix, at least for planning purposes."

RESPONSE

It would be speculative to forecast a numerical estimate of school-aged children that would live in Rincon Hill. As stated in the Draft EIR, new dwelling units would likely be marketed to singles and couples as opposed to families with children.

The available student-per-household ratio factors are useful only as indicators. Data collected by the San Francisco Redevelopment Agency from the Golden Gateway Apartments (in the downtown district) and subsidized housing in the Western Addition provides some student-per-household average figures for market-rate and low/moderate income housing, respectively (Yerba Buena Center Final EIR, EE77.220, January 6, 1978, p. 308). If these factors were applied to the dwelling unit potential analyzed for Rincon Hill, the calculations would yield a 50 to 100 student estimate if all units were available at market rate (.015 students/household), and 750 to 1,350 if all were subsidized units.

Clearly, all dwelling units in Rincon Hill would not be available at low and moderate-income prices, and thus such corresponding student populations would not be anticipated. The ratio factors are not representative of all market-rate and low/moderate-rate housing. Data collected by the San

Francisco School District indicates that student population in neighborhoods containing subsidized housing is lower than that which the Redevelopment Agency estimates would project. Moreover, the District's information, based on current conditions, shows there is generally little or no school-aged population in multi-unit market rate housing complexes. The District information does not provide student-per-household ratio factors. Their findings also indicate that unit size is not necessarily indicative of the number of students that may reside in a household.

Based on their demographic and census research, preliminary findings indicate that the expansion or new construction of school facilities would be recommended in the following areas over the next ten years (Larry Jacobsen; Management Services Division, San Francisco Unified School District, telephone conference, March 28, 1985): a) Tenderloin/North of Market - new elementary (grades K through 5) school; b) Mission Bay - new middle (grades 6 through 8) school; c) Inner Mission (between 14th and Army Streets) - new elementary school; d) Expansion of Bessie Carmichael Elementary School at 55 Sherman, about six blocks southwest of Rincon Hill.

CUMULATIVE IMPACTS

COMMENT

John Elberling, SFRG

> "Given that [t]here is no cumulative impact effort to speak of, SFRG states that a supplement draft on that alone must be prepared and be the subject of draft hearings - we cannot be asked legally to comment now on something that is totally lacking, or told we have no right to ever comment on a new cumulative section prepared as Responses to Comments, prior to certification.
>
> ...Given the recent court decision in SFRG vs. CCSF, this commentor cannot fathom the total omission of cumulative impact evaluation. Must it be noted that this DEIR has been prepared almost simultaneously with the Downtown Plan EIR? Maybe DCP staff on the two projects don't talk to each other?
>
> Let's itemize a few highlights - but of course the whole spectrum of impacts must be reanalyzed and made clear in a new cumulative impacts section:
>
> 1. How much office space in the whole Plan (not clear) at buildout? Added to the Downtown Plan? Added to other SF office development?
>
> 2. Traffic/transportation/housing impacts at all three levels (the Rincon Hill Plan should look good here, except if you do address housing affordability match-ups to jobs, which you have refused to do recently, but which is necessary for an honest EIR)."

RESPONSE

Cumulative analysis of the Rincon Hill Plan is provided for in the Draft EIR on two levels: full build-out impact analysis specific to the Rincon Hill

Plan area; and full build-out analysis as an additional component to the cumulative analysis contained in the Downtown Plan Final EIR (EE81.3) (DTPEIR). This is noted in the Rincon Hill Draft EIR (pp. 6, 74-75, 101). The following summarizes the methodology and cumulative impact analyses provided in the DTPEIR, which are contained on the following pages in the DTPEIR and are hereby incorporated by reference: IV.B.14-75; IV.C.29-54; IV.D.58-81; IV.E.1-3, 28-35; Appendix J, pp.J.1-30; Appendix G, pp.G.1-20; Appendix H, pp.H.6-18; C&R-B.1 - 18; C&R-D.9 - 24; C&R-E.1 - 29. The impacts of full Rincon Hill Plan build-out are then summarized against this backdrop.

Housing

The DTPEIR uses forecasts of development and employment growth in the C-3 District through the year 2000 as the basis for assessing impacts of the Downtown Plan and five alternative C-3 District zoning policies. The employment and residence pattern forecasts incorporate future city-wide and regional employment growth, population growth, demographic trends, real estate market factors and housing demand.

Employment growth has implications for the housing market, although it is not the only factor affecting future housing market conditions. Other demand factors include: the age distribution of the population, household sizes and incomes, mobility and migration, and lifestyle preferences. The list of supply factors includes: land availability, local land use policies, construction costs, and the existing supply of housing. General economic conditions affecting housing finance are also important.

With downtown employment growth, more people would want to live in San Francisco. Some would pay more for housing in the City than they would in a more outlying location because they save on the time and costs of commuting. There would also be more households (both new and existing) with more income to pay for housing. These factors would add to an already strong demand for housing in the City.

At the same time, additional housing will be produced in San Francisco. It is expected that there will be a larger supply relative to employment growth in the future than in the past. The private market is expected to be unable to supply much new housing that would be affordable to a large segment of the population, however. The difficulties in producing affordable housing arise from many factors and exist throughout the region. It is even more difficult to produce affordable housing in San Francisco because of the relatively higher costs for land and construction in the City compared to many other parts of the region.

Given these conditions, housing prices and rents in the City are expected to remain more costly relative to household incomes and to the costs of other goods and services than they were through the early 1970's. With downtown employment growth, there would be more downtown workers living in San Francisco. Some would have the resources to stimulate production of market-rate housing. Others would add to the competition for existing housing, particularly older rental and for-sale units, priced below the average for San Francisco housing. The result would be higher prices and rents for this type of housing.

It is and will continue to be difficult to produce new housing that is affordable to many of the region's residents. Similarly, not all of those workers newly employed in downtown San Francisco because of employment growth will be able to afford new housing. As new housing is built, those who can afford it will move in and others will take the housing they vacate, thereby vacating their housing for other people, and so on. The DTPEIR recognizes the dynamic pattern which occurs as people move in and out of the region and others change their housing within the region for a variety of reasons. It is not simply a situation where the additional people directly occupy the new (additional) housing.

This "re-shuffling" pattern explains why households can be added even though the market is not expected to directly produce new housing that all of them can afford. It also explains how additional households can end up in existing housing in relatively closer-in locations, while the market adds new housing in peripheral locations that are more distant from the center. Thus, it is not appropriate to "match" household incomes of additional workers with the prices and rents of the new housing.

It cannot be expected that San Francisco will accommodate all of the households that would prefer to live in the City. This is explained by the City's role as the employment center for a large region, by the limited land for housing production, and by the relatively higher costs of constructing housing in San Francisco, compared to most suburban developments. Thus, with downtown growth, the number of downtown workers living in the Bay Area counties outside of San Francisco would increase. Downtown workers would continue to represent relatively small shares of the employed population in these other counties, however. They would not require much larger shares of the region's housing in the future than they do now.

As part of total regional employment growth, downtown employment growth would contribute to regional housing demand. A strong regional economy has and will continue to be a factor supporting a regional housing market with relatively high housing prices and rents. By itself, downtown growth would make only a small difference in the region's housing market overall. The housing market impacts of downtown growth are not uniform throughout the region, however. There would be more effects in San Francisco and nearby communities than in more outlying areas.

To a major extent, residential development under the Rincon Hill Plan would be privately sponsored, and thus would not likely be sold below market rate prices. The Plan, implemented by zoning ordinance, only provides for housing cost subsidy via height limit bonuses that could be authorized by the Planning Commission under Conditional Use review./1/ As described in the Plan and Draft EIR, housing subsidies would be derived by determining the dollar value of additional floor area allowed by the height bonuses.

It is expected that other city subsidies would be available through such vehicles as mortgage revenue bonds, which could produce limited amounts of below market rate housing in Rincon Hill.

The extent to which the city's affordable housing supply would be expanded by development in Rincon Hill cannot be determined. It is acknowledged in the

Draft EIR (pp. 23 and 74) that the rate or amount of housing growth in Rincon Hill cannot be projected with any level of certainty. For this reason, the Rincon Hill EIR assumed full zoning build-out, in spite of the fact that this is likely to be an overestimate of actual development. As such, there is no meaningful information available that would indicate what new San Francisco workers would seek housing in Rincon Hill, or what prices they could afford to pay relative to the amount and type of housing that is available at the time.

The Draft EIR analysis assumed a total of about five million square feet of commercial/industrial space in the Plan area. About one million of this total is estimated to be located in residential Subareas One and Two. The EIR analysis assumed an office and retail floor area breakdown of 85% and 15%, respectively for these Subareas One and Two non-residential floor space. The remainder is assumed to develop in Subarea Three, which is proposed for continued use essentially as an M-1 (Light Industrial) district, permitting a wide variety of commercial/office/industrial business activities. These floor area figures, in addition to the maximum residential development potential assumed in the analysis, are listed in Table 10, p. 102 of the Draft EIR.

Again, based on the limited data available and the assumptions in the analysis, it is not possible to estimate the demand for housing in San Francisco generated by potential new employees in Rincon Hill. Housing demand estimates have been calculated for office workers in the greater downtown area based on the Office Housing Production Program (OHPP). Beyond the Subarea One and Two office/retail breakdown itemized in Table 10, the Draft EIR analysis does not estimate what proportion of the Subarea Three development potential would be contained in office use. If all this floor space were occupied by office workers that exhibited the same residence patterns as downtown workers, housing demand under OHPP would be about 1,930 units. According to the ordinance, 62% of these (about 1,197) would have to be affordable to low or moderate income households for 20 years. Other provisions of the ordinance allow in-lieu payments, joint ventures and housing rehabilitation to satisfy OHPP requirements. The ordinance, which is still under review by the Board of Supervisors, would be renewable by the Board of Supervisors every five years. A number of ordinance amendments are presently being considered by the Board and Planning Commission, which would differ in the required proportion of affordable housing (100% for the Board's; and 62% for the Planning Commission), and in the provision that would exempt San Francisco-based firms from OHPP requirements (the Planning Commission version would include the exemption; the Board version would not).

Transportation

The Draft EIR analyzes the transportation impacts of not only the maximum amount of development in the Plan area specifically, but also of Plan development in the context of cumulative downtown development evaluated in the DTPEIR.

To summarize, the DTPEIR analyzes the transportation impacts of downtown growth, providing a comprehensive multi-modal assessment of future development in the C-3 District in the context of the residence patterns, land use characteristics and employment forecasted for 2000. Additionally, the EIR methodology assumed increased future travel demand attributable to estimated

growth of non-C-3 travel based on historic trends of travel at various measurement location "screenlines" (see Downtown Plan EIR, Volume 1, pp. IV.E.6 and IV.E.11). Travel from the Rincon Hill area, which is a component of the non-C-3 travel, is thus included in the analysis.

The non-C-3 component of the transportation analysis reflects City-wide and regional travel demand outside of the C-3 District. Future non-C-3 travel estimates are non-specific because they are derived from the generic growth in auto (traffic) or ridership (transit) travel measured at the screenlines, and there is no data to determine the geographic points of trip origin or destination. With such non-specific estimates, it is not possible to translate the generic growth in travel at the screenlines into corresponding changes in land use or employment in the non-C-3 areas (either inside or outside San Francisco). In other words, it would not be correct to reverse the transportation calculations and arrive at non C-3 employment. (This point is explained in a report by the Department to the Planning, Housing and Development Committee of the Board of Supervisors on May 7, 1985, which is incorporated by reference as summarized above.)

Travel demand resulting from development in Rincon Hill would constitute non-C-3 demand, a portion of which is represented in these DTPEIR travel projections for the year 2000. Unlike the DTPEIR, the Rincon Hill Draft EIR does not make development projections up to the year 2000. The Draft EIR acknowledges that the methodology for estimating development is not projected over a given period of time; it analyzes full zoning build-out that, if realized, would not occur until after 2000. Actually, it is unlikely that full build-out would ever be realized, based on observation of built development in San Francisco in general, relative to the maximum permitted by zoning. However, there was no data available to derive a more realistic development estimate. Similarly, there is no estimate of the rate of residential or commercial development, since no such land use information is available that would provide a basis on which to project future growth. For this reason, there is no time horizon established that would approximate when full build-out would occur, or help to estimate how much of the total development could be expected by 2000.

All transportation analysis in the Draft EIR thus expresses Rincon Hill impacts as an additive component to the cumulative C-3 and non-C-3 impacts evaluated in the DTPEIR. That is, all tables in the Draft EIR that contain impact information (Table 11, p. 103; Table 12, p. 108; Table 14, p. 111) express values that represent DTPEIR cumulative impacts projected in 2000, plus those of full build-out in Rincon Hill. This produces a conservative analysis that will double count transportation impacts of any development in Rincon Hill that is completed and occupied by 2000 (since the DTPEIR analysis already incorporates increases in non-C-3 travel demand through 2000).

The Rincon Hill Draft EIR analysis also took into account the proposed removal of the Embarcadero Freeway, which is evaluated under the I-280 Transfer Concept Program. The Final EIR prepared for the I-280 Program (84.385E) evaluates eight alternative traffic and transit schemes for the northeastern quadrant of San Francisco. Removal of the overhead Embarcadero Freeway is one of the components analyzed in a number of the alternatives, and would most

greatly affect circulation in Rincon Hill. Table 12, p. 108 provides Level of Service ratings for traffic impacts with and without the overhead freeway.

/1/ Please refer to the alternatives section of this document, pp. ___ for additional information regarding revisions that are proposed in Plan policies/zoning in response to public comment, that would affect the mechanism for producing affordable housing.

ALTERNATIVES

COMMENT

Commissioner Bierman

> "It did occur to me that maybe there should be an alternative that shows what the impacts are at the 3,800 level. It's awfully hard to go from 4,000 to 6,800 or 3,800 to 6,800 and know which you ought to do and know which would be better for the city."

RESPONSE

The Rincon Hill Draft EIR analyzes a range of full build-out residential development. The range for this development potential (3,700 to 6,800 dwelling units) is established by a variable parking requirement which is part of the implementing ordinance for the Plan. The ordinance proposes that parking be provided at a minimum of one space for every four dwelling units, and a maximum of one space for each unit. While building height and bulk standards would remain the same, the one space per unit requirement reduces dwelling unit potential due to the greater amount of floor area devoted to parking spaces.

From a transportation standpoint, impacts from the 3,700 dwelling unit potential -- which would constitute an approximate 48% reduction from the 6,800 unit potential (with a 1:4 parking requirement) -- would certainly generate fewer trips in Subareas One and Two. However, in the context of cumulative impacts analyzed at intersections and freeway access routes in Plan area analyzed in the Draft EIR, there would not be a noticeable change in service levels. Table 12, p. 108 of the Draft EIR outlines Level of Service (LOS) ratings for streets in Rincon Hill. In many cases, full Plan build-out would result in borderline changes in LOS ratings (e.g., the Embarcadero, from D to D/E) during the P.M peak period. As such, effects of the reduced residential potential, which would reduce the contribution to peak period trips generated by the Plan by 29%, would not likely be great enough to noticeably improve intersection operation. However, the duration for which these conditions occur could be reduced. Since the reduction of trips with the 3,700 unit scenario would have such limited impacts, there would also be no perceptible change in air quality impacts.

Impacts on transit carriers would be unnoticeable as well, within the daily flux of ridership levels. Table 14, p. 111 of the Draft EIR outlines LOS ratings for transit carriers. Since the Rincon Hill area is currently not well served by transit, and the EIR analysis makes few assumptions about

future (year 2000) service improvements, transit impacts from full Plan build-out are relatively limited. In the cumulative context, which consists primarily of transit demand from projected growth in the greater downtown area, a 29% reduction in transit trips from maximum Plan build-out (i.e. the 6,800 dwelling units analyzed in the EIR) would not affect ridership levels of service.

Potential urban design, shadow, wind and preservation impacts of the 3,700 unit scenario would be the same as the 6,800 unit build-out scheme, since there is no commensurate range in height, bulk or open space requirements proposed. It is possible that building envelopes would more likely be smaller than the maximum allowed by the zoning, although it is not possible to predict to what degree this could occur.

COMMENT

Commissioner Bierman

> "I think that the alternatives, the alternatives in this EIR tell us almost nothing. What we need to know is: What happens if we leave it at 105, or what if we do a plan with just 200-foot or 300-foot buildings? Then we can judge whether we really want to go into this extended height level. I think we need to look seriously at whether we should lower the as-of-right heights if you really believe that giving people extra height will give us a better shot at low-income housing."

John Elberling, SFRG

> "What is blatently missing is a "best case" alternative combining the existing lower height limits of Alternative 2A with the design controls of the Project and Alternative 2B. Thus 2A is found unacceptable because of bulky buildings blocking views, while 2B is turned down due to "ineconomic" use of space.
>
> This is without doubt one of the cheapest, most cynical, and most transparent EIR manipulations this commentor has ever been forced to read. Both alternatives can be rejected for reasons that would be eliminated if their best features were instead combined. How dumb do you think the courts are?
>
> Put forward a best-case alternative using existing height limits with bulk and other design controls intended to avoid view blockage and maximize design interest and quality. Only that is a fair comparison."

RESPONSE

In response to public comment received regarding view and shadow impact concerns of the original Rincon Hill Plan outlined in the June 1984 Proposal for Citizen Review, revisions are currently being considered that would reduce height limits to 250 feet at the top of Rincon Hill. Pages 21 - 30 of this document contain shadow and wind tunnel analyses for one conceptual model of Rincon Hill. Both analyses were prepared before the 250 foot height limit revision was considered. At the time, the shadow and wind studies analyzed

two height scenarios of the model -- one assuming 400 foot high towers in Subarea One, and one assuming 200 foot towers. The shadow photos and accompanying table (Table CR-2), which compare impacts on pedestrian and open spaces opportunities in the Plan area, show that differences in shadow on these particular areas are relatively limited. In the most extreme cases (December), shadows of both 400 and 200 foot towers fall at different points north of the Plan area, across Folsom Street. In most other cases, streets and pedestrian walkways in the Plan area are similarly shaded by either the 400 or 200 foot towers, because this difference in height is not sufficient to alter the amount of sun exposure (or shading) in adjacent areas. The primary difference in shadows affects the extent to which they are cast on rooftops or streetwalls of more distant buildings to the north. A 250 foot height limit thus would not be likely to alter shadow impacts within the Plan area.

The potential wind impacts of Plan build-out with 250 foot towers, however, could be substantially reduced from those created by 400 foot towers. Table CR-6 compares wind speeds for 250 foot towers against the wind speed values presented earlier on pp. 29 of this document (Table CR-3). Please refer to this section for a background discussion of proposed windspeed threshold standards. As shown in Table CR-6, reductions in tower height can result in reduced ratios that approach the 7 mph and 11 mph thresholds for public seating areas and pedestrian areas, respectively.

The above shadow and wind analyses carry the same disclaimer; the projected impacts are accurate only for the particular Plan build-out model that was tested. The measurements presented here have no bearing on those that result from actual future development. As noted in the EIR (pp. 85-87) and in the Urban Design Chapter of this document, future development will be subject to specific environmental evaluation which would likely include shadow analysis and wind tunnel studies.

TABLE CR-6 : COMPARATIVE WIND SPEEDS (YEAR ROUND WEIGHTED AVERAGE)

Windspeed Measurement Location At Ground Level)	Existing	400' Tower	200' Tower	250' Tower
1	.329 (6.9)	.392 (8.2)*	.292 (6.1)	.317 (6.7)
2	.434 (9.1)*	.500 (10.5)*	.420 (8.8)*	.440 (9.2)*
3	.420 (8.8)*	.708 (14.9)**	.554 (11.6)**	.593 (12.4)**
4	.328 (6.9)	.779 (16.4)**	.734 (15.4)**	.745 (15.6)**
5	.288 (6.0)	.290 (6.1)	.286 (6.0)	.287 (6.0)
6	N/A	.834 (17.5)**	.671 (14.1)**	.712 (15.0)**
7	.512 (10.8)*	.388 (8.1)*	.392 (8.2)*	.391 (8.2)*
8	.444 (9.3)*	.299 (6.3)	.297 (6.2)	.298 (6.3)
9	.312 (6.6)	.404 (8.5)*	.348 (7.3)*	.362 (7.6)*
10	.270 (5.7)	.523 (11.0)*	.341 (7.2)*	.387 (8.1)*
11	.441 (9.3)*	.508 (10.7)*	.494 (10.4)*	.498 (10.5)*
12	.376 (7.9)*	.441 (9.3)*	.427 (9.0)*	.430 (9.0)*
13	N/A	.750 (15.8)**	.515 (10.8)*	.574 (12.1)**
14	.347 (7.3)*	.517 (10.9)*	.416 (8.7)*	.441 (9.3)*
15	.346 (7.3)*	.323 (6.8)*	.340 (7.1)*	.336 (7.1)*
16	N/A	.578 (12.1)**	.467 (9.8)*	.495 (10.4)*

NOTES

Values in parenthesis are wind speeds in miles per hour (mph).

N/A: There are currently structures at these measurement locations, and thus no applicable ground level wind speeds.

* Exceeds 7 mph threshold only.

** Exceeds both 7 and 11 mph thresholds.

The 250 foot height limit is analyzed as an EIR alternative. The analysis is provided below and would be added as Alternative 4, in the Alternatives chapter of the EIR:

"4) Alternative 4: 250 Foot Height Limit at the top of Rincon Hill.

This alternative would reduce height limits in the currently proposed 400 foot district, to 250 feet. Height limits surrounding the 250 foot zone would also be reduced to a scale that tapers down from the top of Rincon Hill. Such a decrease in height limit would eliminate the need to have the two subarea designations that are currently proposed in the Plan; there would be no clear distinction between "highrise" and "midrise" residential development. The Plan would therefore be revised to include only a Residential and Commercial/Industrial subarea. Bulk standards would remain the same as originally proposed, as they apply within a 105 foot height building envelope. The lower height limits and subarea boundary changes are shown on Figures 40 and 41, respectively.

Such changes would reduce the scale of permitted building envelopes in the Plan area. They would also decrease residential development potential. Given the variable residential parking requirement proposed in the Plan (maximum of one space for each dwelling unit (1:1); minimum of 1:4), the range of potential residential development would be approximately 2,400 to 4,460 dwelling units, respectively, assuming an average unit size of 750 square feet.

The height revision would reduce the potential impacts of shadows and increased winds from buildings constructed within the smaller building envelope. As noted on pp. 85-87 of this EIR, future development will be subject to specific environmental evaluation, which would likely include shadow analysis and wind tunnel studies.

Transportation impacts corresponding to the reduced height limits would be less than those analyzed in the EIR. A 250 foot tower scenario has the primary effect of reducing dwelling unit potential. A range of 2,400 to 4,460 dwelling units would generate from 35% to 66% of the total trips analyzed in the EIR. Similar to that which was noted in the previous response, these reductions would probably not result in a noticeable change in the level of traffic congestion. The reduction would more likely reduce the length of time over which the projected levels of traffic congestion occur.

The reduced height alternative analyzed here does not provide for any height bonuses for housing subsidies, such as the one included in the original Plan proposal. To whatever extent the height bonuses would actually facilitate the production of below market-rate housing, that potential could not be realized under the 250 foot heights analyzed in this alternative. The production of affordable housing would depend more heavily on the extent to which the City's Mortgage Revenue Bond Program, the Office Housing Production Program (OHPP) or other government funding make subsidies available. However, it is widely understood that State and Federal housing subsidies are not expected to continue."

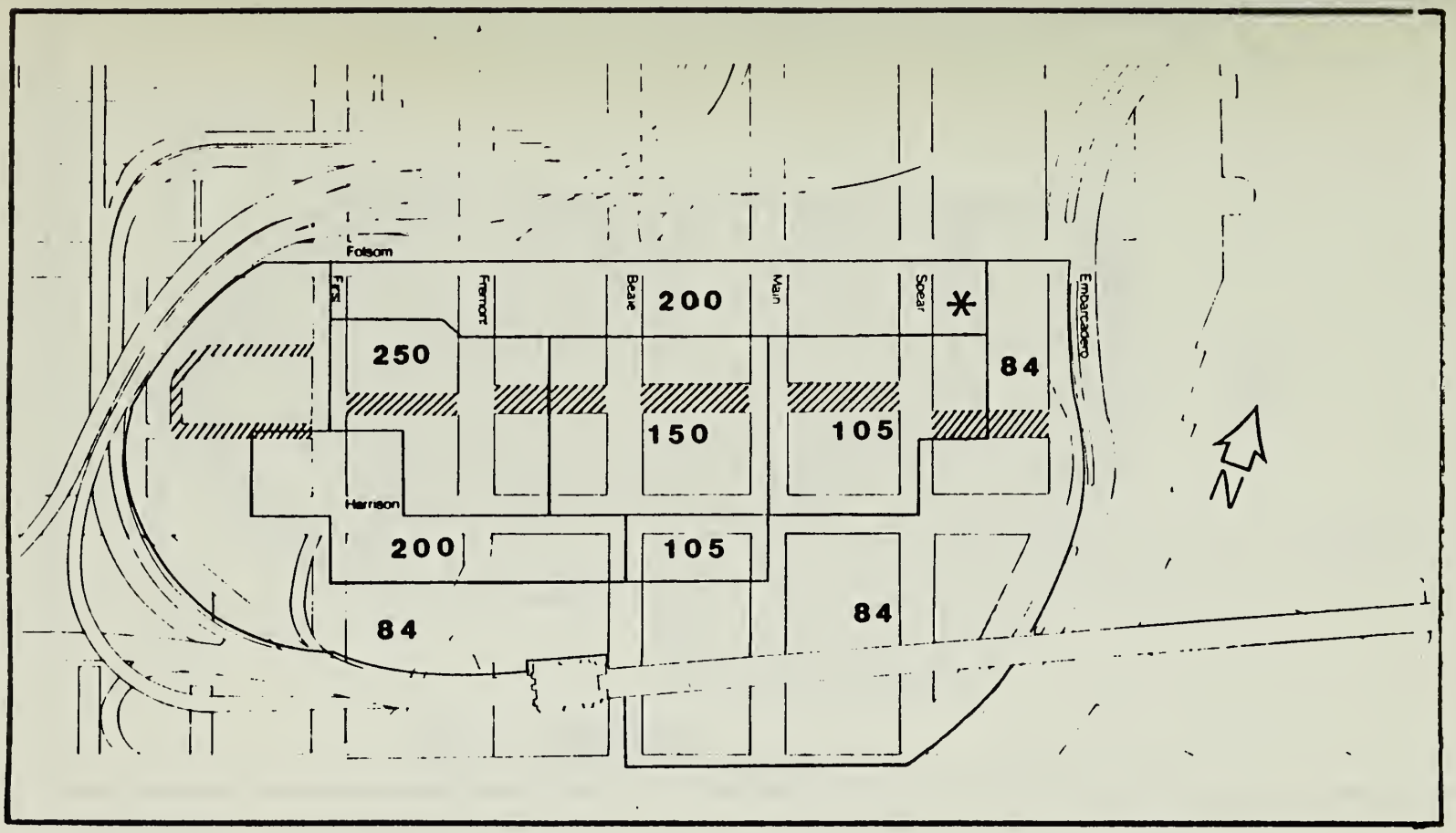


FIGURE 40: ALTERNATIVE FOUR HEIGHT LIMITS

▨ PEDESTRIAN STREET

*Note:

Height on this portion of Block 3744 is subject to further review and analysis of the Hills Brothers project.

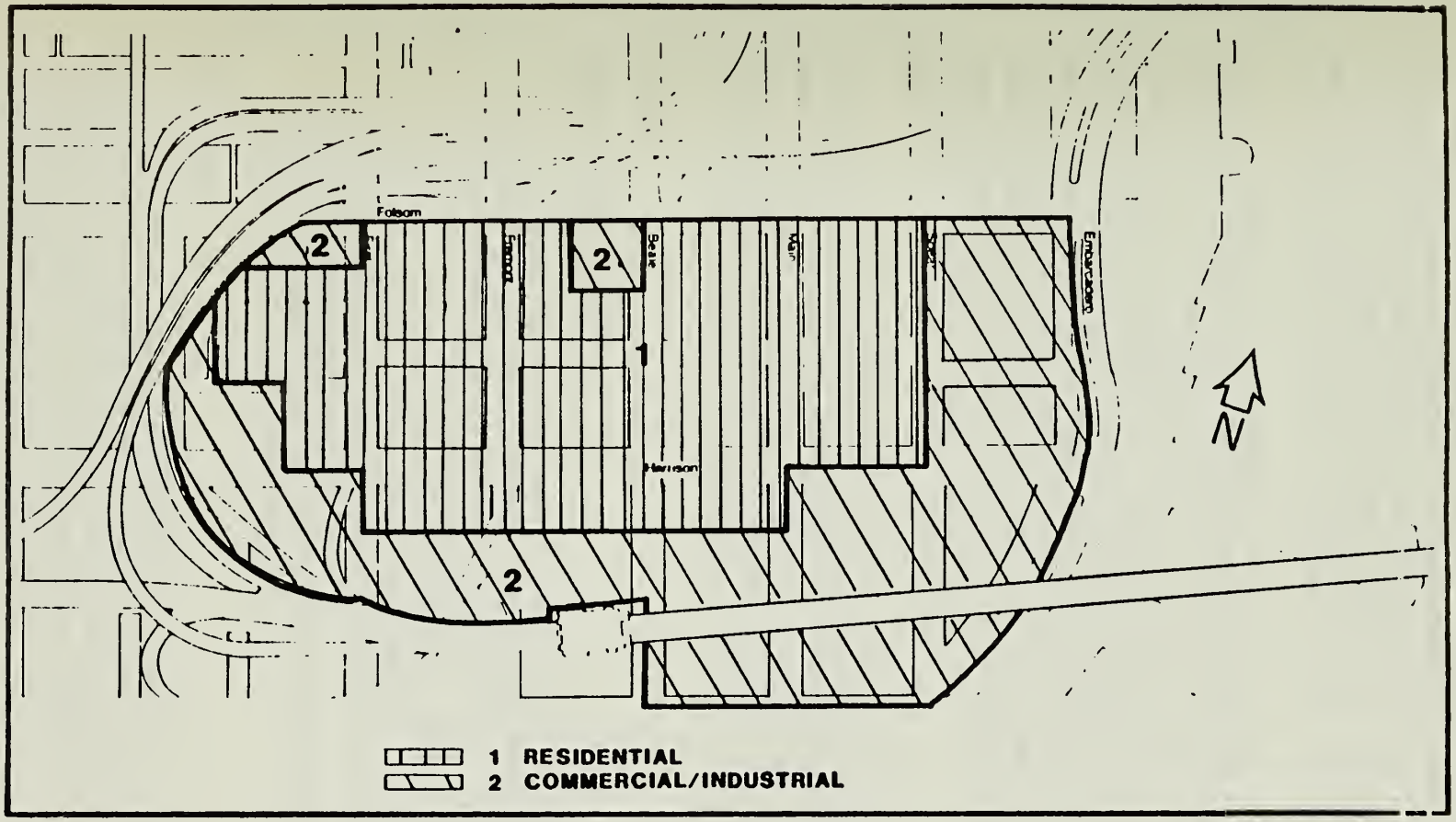


FIGURE 41: ALTERNATIVE FOUR LAND USE PLAN

By analyzing the 250 foot height limit described above, the EIR provides an adequate range of alternatives to describe the potential environmental impacts of rezoning in the Rincon Hill Area. A 105 foot height limit would further reduce residential potential to approximately 1,860 to 3,450 dwelling units at full build-out, depending on how much parking would be provided. Again, it is necessary to understand that these figures are high; there are no instances in San Francisco where an entire residential neighborhood has been built up to the full building envelope, as defined by the zoning.

Clearly, shadow and wind would also be decreased. However, it could not be assured that open space (whether or not it is identified in the Plan) would be unshaded. To illustrate, refer to the shadow photographs for the 200 foot towers tested on pp. 204-5 of this document. By dividing the shadows of the towers roughly in half, it is evident that portions of the pedestrian alleyway would still be shaded. In addition, improvements for pedestrian use on the west sidewalks of Main, Spear and Beale Streets would be shaded; these sidewalks would be shaded by 40 foot tall buildings. The same holds true for wind impacts, which are more unpredictable; under a 105 foot height limit, ground level wind speeds could still be accelerated above the comfort threshold standards. View impacts would also be reduced, allowing greater sky exposure and views of the Bay and Bridge.

The EIR and this comments and responses document have provided as much information in these areas as can be reasonably expected, given the infinite number of possibilities for urban and architectural design permitted under the Plan. Other environmental impacts (e.g. transportation and air quality) are included within the scope of impacts analyzed, and do not warrant separate alternative analysis beyond the four that are already included in the EIR.

COMMENT

John Elberling, SFRG

> "The second major omission of Alternatives is the redevelopment area option. Since the South Beach Redevelopment Area is immediately adjacent to the project site, certainly extension of that area to all or part of the Rincon Hill Plan area is possible. This is worth considering since it offers: (a) more potential funding for affordable housing; (b) more extensive public agency design review/approval; and (c) an alternative means for effective architectural/historic preservation than that proposed above in these comments.
> Beyond any question, the DEIR's Alternatives Section is legally inadequate and by direct result misleading."

RESPONSE

As discussed in several of the above responses, a number of measures will be proposed by the Department that would amend the June 1984 Rincon Hill Plan Proposal for Citizen Review. These recommendations were identified after the Draft EIR comment period, and would more adequately respond to the issues raised from public debate at the public hearings for the Plan and Draft EIR. The main revisions would: reduce height limits at the top of Rincon Hill from 400 to 250 feet; require conditional use for development projects at 40 feet

in height or higher; provide for wind speed comfort standards; and clarify preservation policies, and include an additional building in those policies. The issue of whether the Rincon Hill Plan is implemented by the Department of City Planning, or as a redevelopment plan by the San Francisco Redevelopment Agency is not a basis for further alternative analysis in the EIR. The commentor is correct in pointing out the different agency and citizen review requirements for development proposals, and the government subsidy advantages that can increase the potential for producing affordable housing and/or architectural/historic preservation. These differences, however, are procedural in nature, and do not change the potential environmental impacts that have already been analyzed in the EIR and this responses to comments document.

Under the implementing ordinance for the Rincon Hill Plan, and provisions of the City Planning Code, there are numerous measures which would permit extensive public review of project designs through conditional use review, which requires public hearings. Both the Redevelopment and City Planning processes provide the public this opportunity to debate planning and aesthetic issues; the results of each (i.e. good or not-so-good design) cannot categorically be defined.

The Redevelopment Agency also may take advantage of other means to preserve buildings of architectural/historic merit. However, provisions in the City Planning Code and the proposed revisions to the Rincon Hill Plan would also provide the Planning Commission and Board of Supervisors an adequate means of preserving structures, thus avoiding significant effects.

Were the Redevelopment Agency more successful in producing affordable housing, there would be a broader income range of homeowners that could reside in Rincon Hill. The current EIR analysis makes no assumptions about what proportion of the housing potential would be available at below-market prices. To the extent that lower-priced housing generates different impacts from market-rate housing, they are generally lower in intensity (e.g., auto ownership ratios would be projected to be lower, thus generating fewer trips contributing to traffic congestion). On the subject of new affordable housing, however, the potential of securing further subsidies in light of the current trend of budgetary constraints on the granting Federal agencies is questionable.

If the Rincon Hill area became the subject of a new redevelopment plan that outlined a development scheme different from the current Rincon Hill Plan, an appropriate environmental evaluation would entail an analysis that is wholly separate from this EIR. As a redevelopment plan, such environmental review would be subject to the provisions of both CEQA and the National Environmental Policy Act (NEPA). (If the current Rincon Hill Plan were to be proposed as a redevelopment plan under the jurisdiction of the Redevelopment Agency, it too would be subject to additional NEPA review at that time.)

EIR ORGANIZATION

COMMENT

Richard Morten, Chamber of Commerce

> "I commend the intent and effort of the Department of City Planning staff to prepare a Master Environmental Assessment (MEA) for the Rincon Hill project. The intent of an MEA is to provide an environmental inventory or data base which may be used for planning and information purposes, for assessing environmental effects of future individual projects, and may eliminate the need to prepare complete EIRs for individual projects that do not exceed the full buildout cumulative impacts. Unfortunately, the Rincon Hill EIR does not explicity state that it is an MEA and that future projects may only be required to conduct limited environmental analysis related to the specifics of the project (e.g. wind and shadow analysis). The public should be informed about this matter and the final and certified Rincon Hill EIR should contain statements about the MEA status."

Rin Ten Ten

> "We understand that this EIR, if approved, will function not only as a general EIR for the entire Rincon Hill Plan, but also as a specific EIR for each individual project within the neighborhood. We feel this EIR cannot adequately address specific impacts of individual projects on wind, shadows, construction noise, parking, etc. A supplemental EIR should be required on a project-by-project basis."

RESPONSE

The Rincon Hill Plan EIR has been prepared by the Department as a Program EIR, pursuant to Section 15168 of the CEQA Guidelines. Program EIR's differ from Master Environmental Assessment (defined under Section 15169 of the CEQA Guidelines), which provide for comprehensive database resources that describe existing environmental characteristics of an area.

A Program EIR contains an analysis of environmental impacts of large projects on a more comprehensive level than would be appropriate for EIR's on individual development proposals. In the case of the Rincon Hill Plan, the main purpose of this Program EIR is to analyze cumulative impacts of full build-out in the Plan area, and in the context of environmental impacts generated by growth in the greater downtown area.

The Rincon Hill Plan EIR cannot guarantee an analysis of specific impacts for any given development site in the Plan area. Therefore, each specific development proposal would be subject to individual environmental review which would, to the fullest extent, draw from the analyses contained in this Program EIR. Wind and shadow impacts and site-specific soil conditions, for example, are environmental issues that would typically require individual review. Such additional analysis could be the subject of subsequent negative declarations, or focussed EIR's for subsequent development proposals.

COMMENT

Ron Mulcare

"Now, I am going to be somewhat redundant, but it also goes to the EIR on Page 96 where they say: There is no time frame for the build-out of this project. We can read in the paper on July 19th, Mrs. Scott was stating that she thought this may be built-out by the turn of the century. Well, that is 16 years from now, obviously.

On the other hand, the very same article, we have a Mr. Dommer stating that highrises may be available and will available, he said, in the fall of 1986.

Now, I would submit to you that if you were doing an EIR and requiring an EIR from a private developer, you wouldn't allow him to say: I don't know what's going to happen; I don't know how long this is going to take; and I'm going to do this in the year 2000.

It's totally inadequate as an EIR, and as I pointed out to you before, there is no analysis of what is going to happen in this area. That is what the EIR should be studying, what is going to happen and what will be the impact. The EIR has no time frame whatsoever. It doesn't seek to determine any absorption of these units, what they'll cost. Is the land affordable? It's just totally inadequate from a feasibility standpoint, and there has to be some underlying understanding of the feasibility of the project as a condition to doing an adequate EIR.

It doesn't address the very difficult problem of: How are private developers going to assemble land? You have been told before that this is a unique project in that all you are going to do is rezone and leave it to the market place to assemble, develop, obtain financing, or whatever. Even in the Yerba Buena, where there was condemnation in the Sixties and early Seventies by the redevelopment agency, look how long it took to get that off of the ground -- with the power of condemnation. Here you are leaving it up to the private developer to basically work with you, in a sense starving out the individual property owner until some developer decides that the price has dropped far enough for him to be able to forward it.

There is absolutely no economic feasibility study in this entire process, and it's woefully inadequate for that purpose. I think that the EIR should take this into consideration and you should take it into consideration in determining what permanent activity you are going to undertake on this property, this area."

RESPONSE

The Rincon Hill Plan is proposed to establish zoning and land use controls that would facilitate primarily private development of a new residential neighborhood in San Francisco. As has already been explained in the EIR (p. 23) and in this document, a precise economic analysis of the rate of development and absorption is not possible based on the limited amount of

available data. Rincon Hill, which is zoned for and has served primarily as a light industrial use area, does not provide any clear indicators or trend factors that would allow reliable forecasts.

It is generally agreed upon by planners and practicing professionals in the real estate development community that Rincon Hill is an ideal location for residential development, offering amenities (proximity to the downtown core, weather, views) and site advantages (mainly its size and under-utilized condition) that make it more attractive than other residential opportunity sites. The Plan was prepared, with input from local architects and developers, to propose zoning controls that would meet the stated objectives without making development infeasible. Important factors such as construction, land and labor costs, and interest rates were considered in developing these controls. Thus, the Plan does reflect realistic economic variables in spite of the fact that precise forecasts of the amount and rate of development are not provided.

Even if more precise development forecasts could be provided, they would not address those factors that are a direct and isolated function of private development decisions (i.e. property investment/purchase and site assembly). The Rincon Hill Plan merely provides a set of public policy guidelines for development; the Plan cannot project how or when they might influence private investors who package future development proposals.

The function of an EIR is to evaluate impacts of the development potential of a Plan, as defined through the planning process. It is not the primary purpose, nor is there a requirement to conduct further economic feasibility analysis in the context of an EIR (CEQA Guidelines Section 15731). The Rincon Hill Plan does evaluate full Plan build-out to ensure an analysis of worse-case impacts, even though such full zoning build-out is not likely to be realized. To provide a reference point for the purposes of cumulative analysis, the full build-out impacts were correlated with the year 2000 projection date of the Downtown Plan EIR cumulative analysis. Again, it is quite evident that full Plan build-out would not be realized by this time. However, this approach ensures a reasonably conservative analysis of the scope of impacts in the Rincon Hill area, and in the context of city and regional cumulative effects.

COMMENT

John Elberling, SFRG

> "We are told that this is the first EIR to be prepared "in house" by DCP. Heaven help all of us - you too. It's totally (almost) incompetent. Even the tricks are obvious and easy to shoot full of holes. Fix it, all of it, or you can certainly expect a long delay in Plan implementation due to litigation."

RESPONSE

Commented noted.

COMMENT

Richard Morten, Chamber of Commerce

"The Rincon Hill EIR extensively references and utilizes data from the Downtown Plan EIR. It appears extremely likely that SFRG will legally challenge the Downtown Plan EIR. Could SFRG's legal challenge of the Downtown Plan EIR jeopardize a certified Rincon Hill EIR?"

RESPONSE

CEQA Guidelines permit any document that is a matter of public record to be incorporated by reference in an EIR. As to whether a challenge to the Downtown Plan FEIR would jeopardize the Rincon Hill EIR, this inquiry should be formally addrssed to the City Attorney's Office.

EIR CORRECTIONS

COMMENT

Commissioner Bierman

"Now, Page 18, 19 and 20, there are just three things missing there. Line 22 has a page and then no number. On No. 19, it has a page but the number is missing, and again on Page 20."

RESPONSE

Comment noted. Line 22 on page 18 of the EIR references Figure 2, on page 9. Pages 19-20 reference Map 5 of the Rincon Hill Plan for Citizen Review on page 13.

Rin Ten Ten

"Map Omissions

We wish to point out some errors on the Existing Land Use Map, figure 13, for Assessor's Block 3749.

a) Lot 6: Shown as industrial but, in fact, is residential to be preserved.

b) Lot 47: Shown as commercial, but is partly residential.

c) Lot 2: Shown as a vacant lot, but actually is a restaurant.

d) Lansing Street: Shown as a full street going through to Essex Street, but actually becomes a pedestrian stair at Guy Place."

RESPONSE

Figure 13, on p. 26 of the Draft EIR will be amended to incorporate the corrections noted by the commentor. It should be noted that Lansing Street is a public right-of-way that extends to Essex Street, even though the developed street only connects with Guy Place.

STAFF INITIATED TEXT CHANGES

EIR p. 8; complete paragraph 2; line 15: ". . . (Figure 6, page 3). . ."

EIR p. 18; complete paragraph 2; line 2: ". . . (See Figure 2, page 9). . ."

EIR p. 19-20, Figures 10 and 11: ". . .Alleys (See Map 5, Publicly Accessible Open Space Opportunities Plan, page 13)."

EIR p. 46; complete paragraph 3; line 5: ". . . all buildings erected before 1945. . ."

EIR p. 51; page heading: "Environmental Setting Population"

EIR p. 61; paragraph 4; line 3: ". . . are at about 65dB, . . ."

EIR p. 61; paragraph 4; line 5: ". . . (See Figures 27 and 28, pages 62-63)"

EIR p. 86; paragraph 3; line 5: ". . . since they are south of. . ."

EIR p. 123; paragraph 4; line 8: ". . . for construction after 7:00 P.M. "

EIR p. 135, Cultural and Historic Resources - Measure for Consideration: This measure has been updated to incorporate language pertaining to this issue, that has been developed since publication of the Draft EIR. The measure would read:

> "Should evidence of cultural or historic artifacts of significance be found during excavation for specific development projects in the future, the Environmental Review Office (ERO) and the President of the Landmarks Preservation Advisory Board would be notified immediately, and any excavation which could damage such artifacts halted. The project sponsor would select a qualified archaeologist or other expert to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, could be implemented to preserve or recover such artifacts. The ERO would then recommend specific mitigation measures, if necessary. Depending on the degree to which potential cultural or historic artifacts may be discovered, additional mitigation measures are available that could require archaeological testing prior to excavation work; and on-site archaeological monitoring and analysis during excavation and foundation phases.
>
> Copies of reports prepared according to this mitigation measure would be sent to the California Archaeological Site Survey Office at Sonoma State University. Excavation or construction that might damage the discovered cultural resources would be suspended for a maximum of four weeks (cumulatively for all instances that the ERO has required a delay in excavation or construction) to permit inspection, recommendation and retrieval, if appropriate."

SUMMARY OF CHANGES TO EIR TEXT PER RESPONSES TO COMMENTS

The information below summarizes the substantive changes to the text of the Rincon Hill Plan EIR resulting from comments received on the EIR. The affected EIR pages below correspond with page numbers of this Comments and Responses document, which provide the revised or new EIR text.

Page No. in EIR	Page No. in C/R Document
12, Figure 5	33 (Add new open space opportunities map)
18	8 (Correct policy for Guy Place housing)
21	18 (Revise description of Klockar's Blacksmith)
25, Figure 13	82 (Correct EIR Figure 13-Existing Land Uses)
46	15 (Add new historic preservation setting info)
84	84 (Add open space impacts info)
90	17 (Add new historic preservation impacts info)
95	38 (Revise text on net new employment)
95	40 (Revise OHPP discussion)
119 (and Table 18, p.118)	57-59 (Add new air quality analysis and table)
123	62-63 (Add new noise impacts info)